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**FINAL FINDING OF SUITABILITY TO TRANSFER (FOST), PARCEL IV AND  
PORTIONS OF PARCELS I, II, AND III (PUBLIC DOCUMENT)**

07/01/2004

NAVFAC - SOUTHWEST DIVISION

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**Final**  
**Finding of Suitability to Transfer**  
**(Parcel IV and Portions of Parcels I, II, and III)**  
**Former Marine Corps Air Station**  
**El Toro, California**

July 2004



## CONTENTS

ACRONYMS AND ABBREVIATIONS	ix
1. PURPOSE	1-1
2. PROPERTY DESCRIPTION	2-1
3. REGULATORY COORDINATION	3-1
3.1 National Environmental Policy Act Compliance	3-2
3.2 Resource Conservation and Recovery Act Part B Permit and Subtitle C Corrective Action	3-2
3.3 Resource Conservation and Recovery Act Subtitle I Corrective Action	3-3
3.4 Resource Conservation and Recovery Act Corrective Action Complete Determination	3-4
4. ENVIRONMENTAL CONDITION OF THE PROPERTY	4-1
4.1 Area Types	4-1
4.1.1 Hazardous Substance LOCs	4-2
4.1.2 IRP LOCs	4-2
4.1.2.1 Site 6 – Drop Tank Drainage Area No. 1	4-2
4.1.2.2 Site 13 – Oil Change Area	4-3
4.1.2.3 Site 19 – Aircraft Expeditionary Refueling Site	4-3
4.1.2.4 Site 20 – Hobby Shop	4-4
4.1.2.5 Site 25 – Major Drainages	4-5
4.1.3 AST/UST LOCs	4-6
4.1.4 Wastewater Treatment and Related System LOCs	4-6
4.1.5 PCB-Containing Transformer and Non-Transformer PCB Equipment LOCs	4-6
4.1.6 Miscellaneous LOCs	4-6
4.2 Environmental Concerns Within Parcels Suitable for Transfer	4-6
4.2.1 Transfer Parcel I-A	4-7
4.2.1.1 Hazardous Substance LOCs in Transfer Parcel I-A	4-7
4.2.1.2 IRP LOCs in Transfer Parcel I-A	4-7
4.2.1.3 AST/UST LOCs in Transfer Parcel I-A	4-7
4.2.1.4 Wastewater Treatment and Related System LOCs in Transfer Parcel I-A	4-7
4.2.1.5 PCB-Containing Transformers and Equipment LOCs in Transfer Parcel I-A	4-7
4.2.1.6 Miscellaneous LOCs in Transfer Parcel I-A	4-8
4.2.2 Transfer Parcel II-A	4-8
4.2.2.1 Hazardous Substance LOCs in Transfer Parcel II-A	4-8
4.2.2.2 IRP Site LOCs in Transfer Parcel II-A	4-8
4.2.2.3 AST/UST LOCs in Transfer Parcel II-A	4-8
4.2.2.4 Wastewater Treatment and Related System LOCs in Transfer Parcel II-A	4-8
4.2.2.5 PCB-Containing Transformers and Equipment LOCs in Transfer Parcel II-A	4-9
4.2.2.6 Miscellaneous LOCs in Transfer Parcel II-A	4-9

4.2.3	Transfer Parcel III-A	4-9
4.2.3.1	Hazardous Substance LOCs in Transfer Parcel III-A	4-9
4.2.3.2	IRP Site LOCs in Transfer Parcel III-A	4-9
4.2.3.3	AST/UST LOCs in Transfer Parcel III-A	4-9
4.2.4	Transfer Parcel IV	4-9
5.	NOTIFICATIONS AND RESTRICTIONS	5-1
5.1	School Site Considerations	5-1
5.2	Hazardous Substances and Petroleum Products	5-1
5.3	IRP Sites	5-2
5.4	USTs/ASTs	5-2
5.5	Wastewater Treatment and Related Systems	5-3
5.6	PCBs	5-3
5.7	Medical/Biohazardous Waste	5-4
5.8	Ordnance	5-4
5.9	Pesticides	5-4
5.10	Miscellaneous LOCs	5-5
5.11	Asbestos-Containing Material	5-6
5.12	Lead-Based Paint	5-10
5.13	Radon	5-14
6.	SUMMARY OF RESTRICTIONS	6-1
7.	RIGHT OF ACCESS AND COVENANTS	7-1
8.	CONCLUSIONS/FINDING OF SUITABILITY TO TRANSFER	8-1
9.	REFERENCES	9-1

**TABLES**

1. Buildings/Structures/Facilities Within Parcels Proposed for Transfer
2. Department of Defense Environmental Condition of Property Area Types
3. RCRA Facility Assessment Sites
4. Temporary Accumulation Area Sites
5. Aerial Photograph Anomaly Sites
6. Installation Restoration Program Sites
7. AST/UST Sites
8. Oil/Water Separators
9. Wash Racks
10. PCB Transformers and PCB Transformer/Equipment Storage Areas
11. Non-Transformer PCB Equipment
12. Miscellaneous Locations of Concern
13. Environmental Factors Considered
14. Summary of Asbestos Surveys
15. Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse
- 16a. Notifications and Restrictions Summary – Transfer Parcel Specific
- 16b. Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

## FIGURES

1. Vicinity Map
2. Buildings/Structures/Facilities Within Transferable Parcels
- 3a. Hazardous Substance LOCs
- 3b. Hazardous Substance LOCs
- 3c. Hazardous Substance LOCs
- 3d. Hazardous Substance LOCs
4. Installation Restoration Program Sites
- 5a. AST and UST LOCs
- 5b. AST and UST LOCs
- 5c. AST and UST LOCs
- 6a. Wastewater Treatment and Related System LOCs
- 6b. Wastewater Treatment and Related System LOCs
- 7a. PCB LOCs
- 7b. PCB LOCs
- 7c. PCB LOCs
- 8a. Miscellaneous LOCs
- 8b. Miscellaneous LOCs

## **ATTACHMENTS**

1. No Further Action Regulatory Concurrence Letters
2. Hazardous Substances and Petroleum Products Notification Table
3. DoD Policies on Asbestos, Lead-Based Paint, and Radon at Base Realignment and Closure Properties
4. Comments/Response to Comments
5. Unresolved Comments
6. Installation Restoration Program Sites and Petroleum Groundwater Plumes (Plate Drawing)
7. RCRA Corrective Action Complete Determination Information
8. Notice of Proposed RCRA Corrective Action Complete Determination
9. Final RCRA Corrective Action Determination Package

## ACRONYMS AND ABBREVIATIONS

ACM	asbestos-containing material
APHO	Aerial Photograph Features/Anomalies
AST	aboveground storage tank
BCP	BRAC Cleanup Plan
BCT	BRAC Cleanup Team
BEC	BRAC Environmental Coordinator
bgs	below ground surface
BNI	Bechtel National, Inc.
BRAC	Base Realignment and Closure
Caltrans	California Department of Transportation
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CCR	California Code of Regulations
°	Degree
DBCRA	Defense Base Closure and Realignment Act
DERP	Defense Environmental Restoration Program
DoD	Department of Defense
DON	Department of the Navy
DTSC	Department of Toxic Substances Control
EBS	Environmental Baseline Survey
ECP	Environmental Condition of Property
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
FA	further action
FAA	Federal Aviation Administration
FAD	friable, accessible, and damaged (as applied to asbestos)
FFA	Federal Facility Agreement
FOSL	Finding of Suitability to Lease
FOST	Finding of Suitability to Transfer
HSC	Health and Safety Code
IFB	Invitation for Bid
IRP	Installation Restoration Program
JEG	Jacobs Engineering Group
JP-5	jet propulsion fuel, grade 5
LBP	lead-based paint
LOC	location of concern
LRA	Local Reuse Authority
'	Minute
MCAS	Marine Corps Air Station
mg/kg	Milligrams per kilogram
NAMAR	Navy/Marine
NAVFAC EFD Southwest	Southwest Division Naval Facilities Engineering Command, San Diego
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NEPA	National Environmental Policy Act
NFA	no further action
NFEC SW SDIEGO	Southwest Division Naval Facilities Engineering Command, San Diego
NPL	National Priorities List
OCHCA	Orange County Health Care Agency
OSHA	Occupational Safety and Health Administration
OU	operable unit

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## ACRONYMS AND ABBREVIATIONS

OWS	oil/water separator
PAH	polynuclear aromatic hydrocarbon
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene; also perchloroethylene
ppm	parts per million
pCi/l	Picocuries per liter
PRG	preliminary remediation goal
PWC	Public Works Center
RCRA	Resource Conservation and Recovery Act
RFA	RCRA Facility Assessment
RI	Remedial Investigation
ROD	Record of Decision
RWQCB	Regional Water Quality Control Board
SARA	Superfund Amendments and Reauthorization Act
SVOC	semi-volatile organic compound
SWDIV	Southwest Division Naval Facilities Engineering Command, San Diego
SWMU	solid waste management unit
T#S/R#W	Township # South, Range # West
TAA	Temporary Accumulation Area
TCE	trichloroethylene
TPH	total petroleum hydrocarbons
TRPH	total recoverable petroleum hydrocarbons
TSCA	Toxic Substances Control Act
U.S.	United States
U.S.C.	U.S. Code
USMC	United States Marine Corps
UST	underground storage tank
VOC	volatile organic compound
VSI	visual site inspection

## 1. PURPOSE

The purpose of this Finding of Suitability to Transfer (FOST) for the United States (U.S.) Department of the Navy (DON) is to document environmentally related findings that support the conclusion that real property made available through the Base Realignment and Closure (BRAC) process at the former Marine Corps Air Station (MCAS) El Toro, California, is suitable for transfer by deed per provisions of Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

Portions of Navy Sale Parcels I, II, and III, (designated as Transfer Parcels I-A, II-A, and III-A, respectively) and all of Navy Sale Parcel IV (Transfer Parcel IV), have been identified as suitable for transfer. These parcels have been developed based on the Environmental Condition of Property (ECP) and the Navy's conveyance strategy. This FOST was prepared in accordance with U.S. Department of Defense (DoD) guidance documents, including the *DoD Base Reuse Implementation Manual* (DoD 1997) and the *Department of Defense Policy on the Environmental Review Process to Reach a Finding of Suitability to Transfer for Property Where Release or Disposal Has Occurred* (DoD 1994b). This FOST, including tables and figures, is based on the findings of the Final Environmental Baseline Survey (EBS), September 2003 (Earth Tech 2003) for former MCAS El Toro.

The 2003 EBS was prepared as an update to the previous EBS prepared in April 1995 (Jacobs Engineering Group [JEG] 1995a) in support of upcoming transfer actions. The 2003 EBS updated the status of environmental factors and locations of concern (LOCs) identified in the 1995 EBS. The findings of the 2003 EBS evaluated the ECP and assigned area type categories to the property. These findings were used to determine if the property is suitable for transfer. The U.S. Environmental Protection Agency (EPA), Region 9 and the California State Department of Toxic Substances Control (DTSC) concurred with the findings of the Final EBS (Earth Tech 2003) in letters dated 25 September 2003 (Attachment 1).

A Finding of Suitability to Lease (FOSL) has also been prepared to support the lease of areas not suitable for transfer at this time. Such areas encompass LOCs where further evaluation and/or actions are ongoing or required. These areas have been designated as 'Carve-out Parcels' (referred to as 'Carve-outs' in the rest of this document) within each of Navy Sale Parcels I, II, and III. The FOSL establishes restrictions (as applicable) that will be imposed on leased property in order to allow use of the property without impeding environmental cleanup and to prevent human exposure to potential contaminants while remedial action is being conducted. Sites not suitable for transfer include areas where further evaluation, implementation of response actions, or completion of response actions and subsequent regulatory agency concurrence is required. (DON strongly recommends that this FOST be read in conjunction with the *Finding of Suitability to Lease for Carve-outs Within Parcels I, II, and III, Former Marine Corps Air Station, El Toro, California*, July 2004).

With respect to the evolution of potential reuses after MCAS El Toro was listed for closure pursuant to the Defense Base Closure and Realignment Act (DBCRA) of 1993, as amended, the County of Orange, which became the Local Reuse Authority (LRA) under BRAC in 1996, proposed, during the period between 1994 and 2002, a commercial aviation use for MCAS El Toro. This proposal was submitted as a BRAC reuse plan. In March 2002, the County voters overturned those planning efforts with the passage of Measure W. This referendum changed the Orange County General Plan for MCAS El Toro to a non-aviation use and recreational theme, with limited development intensities. After the March 2002 vote, the LRA decided that it would not prepare another BRAC reuse plan for the property. Currently, the City of Irvine has annexed the installation property. However, no City of Irvine plan has been prepared as a BRAC reuse plan. Consequently, the Navy is not disposing of the property in connection with any particular reuse or redevelopment plan, and



anticipates that reuse will ultimately be determined by local zoning applicable at the time of sale. Moreover, all property in the FOST is suitable for residential use, which is the most stringent of any land use, as long as the applicable notifications and restrictions outlined in Section 5 of this FOST are adhered to.

Environmental documentation for former MCAS El Toro, which was used to prepare the EBS, is part of the Administrative Record and is available at the former MCAS El Toro (currently maintained at Building 83, Telephone: 949-726-5398) and at Southwest Division, Naval Facilities Engineering Command, San Diego (abbreviated as NAVFAC EFD Southwest or NFECSW SDIEGO; formerly abbreviated as SWDIV), 1220 Pacific Highway, San Diego, CA, Telephone: 619-532-3676. In addition, pertinent environmental documentation is also available at the Information Repository at the Heritage Park Regional Library, 14361 Yale Avenue, Irvine, CA 92714, Telephone: 949-551-7151. This FOST document is also available at the above listed locations.

Access to review public records supporting the California Regional Water Quality Control Board, Santa Ana Region (RWQCB) or Orange County Health Care Agency (OCHCA) cleanup and corrective action decisions for underground storage tanks (USTs) and aboveground storage tanks (ASTs) relied upon in the Draft Final FOST and proposed Resource Conservation and Recovery Act (RCRA) Corrective Action Complete Determination and RCRA Facility boundary modification, including no further action (NFA) decisions, may be reviewed by contacting the Santa Ana RWQCB at 909-782-4499 or OCHCA at 714-834-3536.

## 2. PROPERTY DESCRIPTION

The information provided in this section was primarily obtained from existing information contained within the 1995 EBS (JEG 1995a), the 1999 BRAC Cleanup Plan (BCP) (United States Marine Corps [USMC]/SWDIV 1999), the 2001, 2002, and 2003 BRAC Business Plans (USMC/SWDIV 2001, 2002, 2003), and the 2003 EBS (Earth Tech 2003). Former MCAS El Toro is situated in south-central Orange County, California, approximately 45 miles southeast of Los Angeles (Figure 1). The exact location of former MCAS El Toro is 33 degrees (°) 38 minutes (′) to 33° 41′ north latitude, 117° 41′ to 117° 45′ west longitude, Township 6 South, Range 6 West (T6S/R6W) (Sections 2-5, 7-11, 16-17, 20-21) and T5S/R8W (Sections 32-33, 35).

Former MCAS El Toro is currently owned by the U.S. under control of the DON and the USMC. The station currently encompasses 3,793 acres of property.

Development of former MCAS El Toro began in July 1942, when construction of a USMC pilot's fleet operational training facility began on approximately 2,319 acres of land in Orange County, California. The facility was commissioned as MCAS El Toro on 17 March 1943. In 1950, the station was selected for development as a master jet air station and permanent center for marine aviation on the west coast to support the operations and combat readiness of Fleet Marine Forces, Pacific. Between 1944 and 1986, additional land was acquired to bring the size of the on-station portion of the installation to 4,712 acres.

The station remained at 4,712 acres until recently, when portions of the property were transferred to other federal and state agencies. In 1998, the Bake Parkway/Interstate 5 public highway expansion project was completed resulting in the transfer of approximately 23 acres to the California Department of Transportation (Caltrans). In 2001, 896.7 acres in the northeast portion of the station were transferred to the Federal Aviation Administration (FAA). Environmental documentation on these transferred properties is included in the administrative record for former MCAS El Toro. In addition, 73.7 acres of property, also in the northeast portion of the installation, were not addressed in the 2003 EBS since a Site Specific EBS has already been completed for this area (Earth Tech 2001). Therefore, the 2003 EBS addressed a total of approximately 3,719 acres. The environmental documentation for these properties is contained in the Administrative Record for El Toro maintained at the locations listed in Section 1.0. Figure 2 identifies these portions.

The mission of MCAS El Toro was to maintain and operate facilities and to provide services and material to support the operation of aviation activities and the units of the operating forces of the USMC. MCAS El Toro also provided support for other activities designated by the Commandant of the Marine Corps, in coordination with the Chief of Naval Operations (USMC/SWDIV 1999).

MCAS El Toro was operationally closed in July 1999 in accordance with the DBCRA of 1990. Currently, the majority of the buildings/structures/facilities are vacant, and the primary activities at the station are caretaker related and environmental cleanup. Various buildings/structures/facilities and areas within former MCAS El Toro, totaling 965 acres, are leased. Buildings/structures/facilities and areas used by the lessees within the station include the golf course and associated buildings/structures/facilities, horse stables, a recreational vehicle storage area, and the fire station. There are approximately 580 acres of station property currently designated for agricultural outleases. Agricultural outlease lands are situated at the northwest and southeast corners of the station and are used for plant nurseries and crop production (USMC/SWDIV 1999).

Of the approximately 3,719 acres addressed in the 2003 EBS, the property proposed for transfer that is addressed in this FOST comprises approximately 2,798 acres of former MCAS El Toro. This area consists of four transfer parcels described below and shown in Figure 2. The remaining 921 acres of

former MCAS El Toro are addressed in the *Finding of Suitability to Lease for Carve-outs Within Parcels I, II, and III, Former Marine Corps Air Station, El Toro, California* (the Carve-outs for the lease areas are also shown on Figure 2).

- Transfer Parcel I-A consists of approximately 809.5 acres situated in the northwest section of former MCAS El Toro. It contains 225 non-demolished buildings/structures/facilities and 218 LOCs.
- Transfer Parcel II-A consists of approximately 1,439.6 acres situated in the eastern section of former MCAS El Toro. It contains 1,078 non-demolished buildings/structures/facilities and 201 LOCs.
- Transfer Parcel III-A consists of approximately 329.0 acres situated in the southwest section of former MCAS El Toro. It contains 10 non-demolished buildings/structures/facilities and 17 LOCs.
- Transfer Parcel IV consists of approximately 219.4 acres situated in the southernmost section of former MCAS El Toro. It consists of agricultural lands and contains no buildings/structures/facilities or LOCs.

A list of the non-demolished buildings/structures/facilities within the transfer parcels is provided in Table 1. Locations of all non-demolished buildings/structures/facilities are shown on Figure 2. Discussions of LOCs within each proposed transfer parcel are provided in Section 4.2. All LOCs in the FOST require NFA and have received regulatory concurrence.

### 3. REGULATORY COORDINATION

MCAS El Toro was listed on the U.S. EPA National Priorities List (NPL) under CERCLA in February 1990. In October 1990, the U.S. EPA, California EPA Department of Health Services (the Department of Health Toxic Substances Control Program was the predecessor to the DTSC), RWQCB, and the DON signed a Federal Facility Agreement (FFA). The general purposes of the FFA are to:

1. Ensure that environmental impacts associated with past and present activities are thoroughly investigated and appropriate remedial action is taken as necessary to protect the public health, welfare, and the environment;
2. Establish a procedural framework and schedule for developing, implementing, and monitoring appropriate response actions in accordance with CERCLA/Superfund Amendments and Reauthorization Act (SARA), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), the RCRA guidance and policy, Superfund guidance and policy, and applicable state law;
3. Facilitate cooperation, exchange of information, and participation of the parties in such action; and,
4. Ensure the adequate assessment of the potential injury to natural resources and the prompt notification to and cooperation and coordination with federal and state natural resource trustees to ensure the implementation of response actions to achieve appropriate clean-up levels.

The Defense Environmental Restoration Program (DERP), codified in 10 United States Code (U.S.C.) 2701–2709 and 2810, gave the DoD Installation Restoration Program (IRP) a statutory basis. The DON implements the DERP subject to, and in a manner consistent with CERCLA and its regulations.

The President, by Executive Order 12580, delegated most of his CERCLA authority to the U.S. EPA; however, in the case of hazardous substances releases on DoD Properties, the President delegated his authority to the DoD. Accordingly, the DoD has lead agency authority to respond to such releases at DoD installations. The DoD has re-delegated its lead agency authority to the individual military departments (e.g., DON).

On installations slated for closure, such as former MCAS El Toro, DoD guidance directs the formation of a BRAC Cleanup Team (BCT). At former MCAS El Toro, the BCT consists of one representative from the DON (the Marine Corps BRAC Environmental Coordinator [BEC]), two representatives from the state (DTSC and RWQCB), and one representative from U.S. EPA. The BEC is the lead member of the BCT. The BCT for former MCAS El Toro functions to coordinate and oversee cleanup at the installation. The BCT has reviewed and approved documents pertaining to environmental investigations and remediation at former MCAS El Toro that are included in Section 9.

The U.S. EPA, DTSC, and the Santa Ana RWQCB were notified of the initiation of the FOST and have been issued copies for review.

Per FOST policy in the DoD Base Reuse Implementation Manual, timely comments to this FOST from regulatory agencies and other interested parties, as well as DON responses to comments, are provided in this FOST as Attachment 4. Unresolved regulatory agency comments, if any, are also provided in this FOST as Attachment 5.

### 3.1 NATIONAL ENVIRONMENTAL POLICY ACT COMPLIANCE

An Environmental Impact Statement (EIS) (DON 2002a) was prepared for the disposal and reuse of the former MCAS El Toro in compliance with the requirements of the National Environmental Policy Act (NEPA). DON prepared a Record of Decision (ROD) for the disposal and reuse of the former MCAS El Toro that was executed on 23 April 2002 (DON 2002c). This NEPA ROD states, "Under the authority of the DBCRA of 1990, DON announces its decision to dispose of the former MCAS El Toro in a manner consistent with state and local land use plans, and in accordance with lawful disposal authorities, including public sale. In deciding to dispose of MCAS El Toro, DON has determined that mixed land use is consistent with the Orange County General Plan, as recently amended by the passage of the Orange County Central Park and Nature Preserve Initiative (Measure W) on March 5, 2002, and the City of Irvine General Plan. Mixed land use also will meet the goals of local economic redevelopment and job creation set out in the DBCRA. This ROD leaves selection of the particular means to achieve redevelopment to the acquiring entity and the local zoning authorities."

### 3.2 RESOURCE CONSERVATION AND RECOVERY ACT PART B PERMIT AND SUBTITLE C CORRECTIVE ACTION

This FOST reviews sites that were evaluated and addressed under DON's CERCLA and DERP authority as well as sites addressed under the corrective action requirements of RCRA Subtitle C (for Solid Waste Management Units [SWMUs]) and RCRA Subtitle I (for USTs) and associated state laws and regulations administered by U.S. EPA, the State of California, and the County of Orange. See *DoD Base Reuse Implementation Manual* (DoD 1997), pages F-30, F-32, and F-35. These cleanup authorities are similar to CERCLA in that they require response/corrective action (cleanup) where necessary in order to ensure adequate protection of human health and the environment. See Section 121(d) of CERCLA, Health and Safety Code (HSC) §25296.10(b), Title 23 California Code of Regulations (CCR) §§2720 (definition of "corrective action") and 2725(c), and Title 22 CCR §66264.101(a).

A decision that no action is required in order to protect human health and the environment made by DON or an environmental regulator under those laws and regulations also supports a DON determination under Section 120(h) of CERCLA that all remedial action necessary to protect human health and the environment with respect to any such substance remaining on the property has been taken and a determination that all necessary RCRA Subtitle C corrective action has been completed.

The former MCAS El Toro is subject to a RCRA Part B permit that was issued in June 1993 and expired on 18 August 2003. The permit addressed one regulated unit (Building 673-T3) as well as RCRA corrective action requirements for SWMUs. The RCRA permit incorporated the FFA for MCAS El Toro by reference and provided in relevant part: "The activities required by the Agreement are intended to satisfy the corrective action requirements of RCRA section 3004(u) and (v), 42 U.S.C. Section 6924(u) and (v). The Agreement and any schedules contained therein are hereby incorporated by reference as the schedule for completing corrective action at the facility..." (Subsection V.A.1 of the permit). The FFA itself specifically requires that RCRA corrective action requirements be addressed in the FFA process. See Subsections 1.1(b), 1.2(e), 3.1, 17.1, 17.2, 17.3, and 19 of the FFA.

The rationale for integrating CERCLA and RCRA corrective action requirements in this fashion is straightforward. The cleanup standard for CERCLA is set forth in Section 121 of CERCLA (CLEANUP STANDARDS), which states in relevant part of Subsection 121(b)(1): "...The President shall select a remedial action that is protective of human health and the environment..." (42 U.S.C. Section 9621(b)(1)). The cleanup standard for RCRA Subtitle C corrective action in the

State of California is set forth at Title 22 CCR §66264.101(a) and provides, "The owner or operator of a facility seeking a permit for the transfer, treatment, storage, or disposal of hazardous waste shall institute corrective action as necessary to protect human health and the environment for all releases of hazardous waste or constituents from any solid or hazardous waste management unit at a facility, regardless of the time at which it was placed in such unit." See also HSC §§25187 and 25200.10(b).

In a letter dated 8 March 1996, DTSC concurred with NFA for Building 673-T3 and stated that the Permit was terminated based on the Closure Certification Report that was submitted by DON (copy included in Attachment 7). DON continues to complete all RCRA Part B permit corrective actions for the SWMUs under the 1993 executed FFA.

This FOST includes those SWMUs for which cleanup actions have been completed and NFAs were received. Those areas that DON is still in the process of completing corrective actions are discussed in the FOST. DON will, therefore, continue to cooperate with DTSC in resolving RCRA corrective action issues including RCRA corrective action complete determination(s).

DTSC has proposed a RCRA corrective action completion determination for this FOST property (see section 3.4). Additionally, DTSC has proposed a California Environmental Quality Act (CEQA) Notice of Exemption (NOE) for DTSC's proposed RCRA Corrective Action Completion Determination. The NOE included the following language in the "Reasons Why Project Is Exempt" section: "The project is an administrative decision by DTSC that previously completed investigations and cleanup activities conducted under the regulatory oversight of DTSC, the US EPA, the Regional Water Quality Control Board, Santa Ana Region, and the Orange County Health Care Agency, on the property identified in the Finding of Suitability to Transfer (FOST) as Parcel IV and Portions of Parcels I, II, and III, have satisfied the corrective action requirements under RCRA and the Hazardous Waste Control Law."

Tables 3 through 12 summarize pertinent information towards documentation of the determination of closure action completion for all LOCs within transfer parcels. The closure letters are provided in Attachment 1 and correspondence between DON and DTSC is provided in Attachment 7.

### **3.3 RESOURCE CONSERVATION AND RECOVERY ACT SUBTITLE I CORRECTIVE ACTION**

OCHCA and the RWQCB administer the UST corrective action program at MCAS El Toro pursuant to RCRA Subtitle I and Section 25280-25299.8 of the California HSC. The authority of OCHCA and the RWQCB to require corrective action at UST sites is set forth at Title 23 CCR Chapter 16.

These regulations specifically define "corrective action" as "...any activity necessary to investigate and analyze the effects of an unauthorized release; propose a cost-effective plan to adequately protect human health, safety, and the environment and to restore or protect current and potential beneficial uses of water; and implement and evaluate the effectiveness of the activity(ies)..." (Title 23 CCR §2720). Furthermore, §2725(c) of the regulations sets forth requirements for Corrective Action Plans prepared by responsible parties and states that, "The regulatory agency shall concur with the Corrective Action Plan after determining that implementation of the plan will adequately protect human health, safety, and the environment and will restore and protect current potential beneficial uses of water."

NFA letters issued by the OCHCA specifically stated that NFA determinations were based upon §2721(e) of those regulations which provides "Upon completion of required corrective action, the regulatory agency shall inform the responsible party in writing that no further work is required at that time, based on available information."

HSC §25296.10(a) was recently amended and now provides that the State Water Resource Control Board "...shall develop corrective action requirements for health hazards and protection of the environment based on the severity of the health hazards and protection of the environment,..." HSC §25296.10(b) provides, "Any corrective action conducted pursuant to this chapter shall ensure protection of human health, safety, and the environment."

The corrective action cleanup standard for USTs implemented by the RWQCB and OCHCA are codified in HSC 25296.10(b), Title 23 CCR 2720 (definition of "corrective action") and Title 23 CCR 2725(c) (soil and water investigation phase, corrective action plan). As noted in Section 3.2, DTSC has determined that investigations and cleanups conducted under the oversight of the Regional Water Quality Control Board and Orange County Health Care Agency on property identified in this FOST as Parcel IV and Portions of Parcels I, II, and III have satisfied the corrective action requirements under RCRA and the Hazardous Waste Control Law.

This FOST includes those UST sites for which Subtitle I corrective actions have been completed and NFAs were received. Those USTs in which DON is still in the process of completing corrective actions are discussed in the FOSL.

### **3.4 RESOURCE CONSERVATION AND RECOVERY ACT CORRECTIVE ACTION COMPLETE DETERMINATION**

DTSC provided the following paragraphs summarizing the DTSC RCRA corrective action complete determination at former MCAS El Toro. It has been included in the Final FOST at DTSC's request.

DTSC is the agency responsible for enforcing the hazardous waste laws and regulations in California. California was granted authorization by the EPA to administer a state hazardous waste program in lieu of the federal RCRA program. The Hazardous Waste Control Law codified in the HSC is the basic law that implements the waste management system in California. Section 25200.10 and 25187 of Chapter 6.5 of Division 20 of the HSC provides the authority to require corrective action at a hazardous waste facility. It states that DTSC, and any permit issued by DTSC, shall require corrective action for all releases of hazardous waste or constituents from a SWMU or a hazardous waste management unit. For the purpose of implementing corrective action, a hazardous waste facility is defined as all contiguous property under the control of the owner or operator of the facility (CCR, Title 22, Section 66260.10 [Definition of a Hazardous Waste Facility]). DTSC's determination that all corrective action has been completed for a portion of a facility eliminates the requirement to conduct further corrective action from the current and future owners of the property. Attachment 8 summarizes DTSC's intent to make the RCRA Corrective Action Complete for portions of the former MCAS El Toro identified in this FOST.

DTSC issued a public notice on a proposed RCRA Corrective Action Complete Determination and a RCRA Hazardous Waste Facility Boundary Modification at the former MCAS El Toro. In addition, DTSC issued a public notice for a proposed NOE prepared for the project under the CEQA. The same notice also requested comments on the DON's Draft Final FOST for certain properties at MCAS El Toro. DTSC mailed the public notice to all individuals on the MCAS El Toro mailing list (approximately 600) on April 30, 2004. Also, the public notice was published in the Los Angeles Times and the Orange County Register on May 2, 2004. The 45-day public comment period started on May 3, 2004 and ended on June 17, 2004. DTSC has considered all comments received during the public comment period on the RCRA Corrective Action Complete Determination and has made a decision to approve the Determination and RCRA Facility Boundary Modification. The DON also received comments on the Draft Final FOST and has responded to those comments in Attachment 4 of the Final FOST.

DTSC concurred on the Final FOST dated July 2004 on July 22, 2004. Also, DTSC responded to public comments, finalized the NOE, and approved the RCRA Corrective Action Complete Determination and a RCRA Hazardous Waste Facility Boundary Modification at the former MCAS El Toro on July 23, 2004. Copies of the concurrence letter, Final NOE, DTSC Response to Comments, and approval for Corrective Action Complete Determination and a RCRA Facility Boundary Modification are included in Attachment 9.



## 4. ENVIRONMENTAL CONDITION OF THE PROPERTY

### 4.1 AREA TYPES

The BCP Guidebook provides the FFA signatories with direction to classify base property into one of seven ECP area types in order to facilitate and support reuse and transfer (DoD 1996). Descriptions of the seven area types are provided in Table 2. The area types are ranked in order of their suitability for transfer. Area type 1 through 4 properties are considered suitable for transfer by deed. Area type 5 and 6 properties are considered unsuitable for transfer by deed until all remedial actions have been completed or after the remedy has been demonstrated to be operating properly and successfully. Property classified as area type 7 either has not been evaluated or requires further evaluation in order to classify it into one of the other area types and is also considered unsuitable for transfer.

The boundaries of properties proposed for transfer encompass LOCs designated as area types 1, 2a, 2b, 3, and 4 (area type 2 has five subcategories described in Table 2); properties where no LOCs are present are considered to be area type 1. LOCs are areas where a release is suspected to have occurred; where a documented release has occurred; or based on the types of activities that occurred in a given area, had the potential for a past release. For each LOC within properties proposed for transfer, regulatory agencies have provided written concurrence that NFA is required. These NFA designations are based on the findings of evaluations or cleanup actions that these LOCs are suitable for residential use, which is the most stringent of any land use, as long as the applicable notifications and restrictions outlined in Section 5 of this FOST are adhered to. This includes all LOCs that meet the federal and state definitions of SWMUs and received NFA designations either because no corrective action was required in order to provide adequate protection of human health and the environment or required corrective action has been completed.

All transfer parcel (FOST) property is not expected to be negatively impacted by adjacent properties as defined by CERCLA Section 120 (h)(4)(A)(v), and contiguous carve-out (FOSL) properties (associated with further action [FA] LOCs) based on the following:

1. Sufficient site characterization conducted under regulatory oversight (extent of contamination well defined).
2. Buffer zones established for IRP Sites with finalized RODs.
3. Buffer zones concurred upon by FFA signatories for IRP Sites with RODs not finalized.
4. Conservative estimates of the extent of probable contamination including allowance for adequate staging area used for sites needing further evaluation.

Within the properties proposed for transfer, LOCs are present that include hazardous substance sites (RCRA Facility Assessment [RFA] sites, temporary accumulation area [TAA] sites, and aerial photograph features/anomalies [APHO] sites), IRP sites, storage tanks, wastewater treatment and related system sites, polychlorinated biphenyl (PCB) containing transformers and equipment, and miscellaneous. During the preparation of the 1995 EBS (JEG 1995a), miscellaneous LOCs were identified to be those sites that do not fall under a general LOC type, such as pesticide storage areas, fire training burn pits, silver recovery units, and drum storage areas. A summary of LOCs by type is provided in the following subsections, and more detailed descriptions of LOCs by transfer parcel are provided in Section 4.2.

The ECP was generally characterized based upon review of existing information in public records, interviews, visual inspections, etc. as set forth in the description of methods and sources listed immediately above. Not all characterization on the installation was based upon sampling. Where the

information collected and reviewed pursuant to the listed methods and sources was deemed to be insufficient to characterize the ECP, representative samples were collected and analyzed.

NFA concurrence letters for all LOCs on FOST property are presented in Attachment 1.

#### 4.1.1 Hazardous Substance LOCs

A total of 108 hazardous substance LOCs that received regulatory agency concurrence for NFA decisions are present within the parcels proposed for transfer. These include 26 RFA sites, 12 TAA sites, and 70 APHO sites. These hazardous substance LOCs are described in Tables 3, 4, and 5 and are shown in Figures 3a - 3d.

#### 4.1.2 IRP LOCs

The parcels proposed for transfer contain all or portions of 5 IRP sites (IRP Sites 6, 19, 20, and portions of both IRP Sites 13 and 25) that have received regulatory agency concurrence for NFA decisions. IRP Sites 6, 19, and 20 are situated entirely within areas proposed for transfer and have received regulatory agency concurrence for NFA decisions. IRP Sites 13 and 25 have received regulatory agency concurrence on the NFA decision. However, portions of IRP Sites 13 and 25 are within property not suitable for transfer due to the overlapping presence of other LOCs. These IRP sites are shown on Figure 4 and Attachment 6, and are described in Table 6 and the following paragraphs (Earth Tech 2003).

##### 4.1.2.1 SITE 6 – DROP TANK DRAINAGE AREA NO. 1

IRP Site 6 is within Transfer Parcel II-A and encompasses approximately 3 acres bounded by taxiways to the north and west, a concrete aircraft parking apron to the east, and East Marine Way to the south. The site consists of three units:

- Unit 1 is an area along the edge of a concrete parking apron where aircraft drop tanks were formerly drained of residual jet fuel and then cleaned prior to reuse.
- Unit 2 is a shallow drainage swale that extends from the north side of Building 727, west to a catch basin that eventually discharges into the Agua Chinon Wash. The catch basin receives surface runoff and sediment from the site.
- Unit 3 is a flat, grass-covered area south of the drainage swale where drop tanks were stored.

From 1969 to 1983, aircraft drop tanks were transported to the site where the fuel remaining in the tanks was drained. Residual jet propulsion fuel, grade 5 (JP-5) in the tanks was drained to the concrete apron, and the combined fuel/rinse water ran onto the adjacent grassy area. In addition to fuel, waste lubricant oils from maintenance operations were also reportedly stored in drums and staged in the area.

Approximately 1,400 gallons of JP-5 fuel were reportedly drained from the drop tanks onto the concrete apron and washed onto the adjacent area. Portions of the unpaved areas at the site were also reportedly used for storing oil drums. It has been estimated that approximately 300 gallons of waste oil leaked from these storage drums at the site.

Investigations conducted at IRP Site 6 include a Phase I Remedial Investigation (RI) and aerial photograph surveys in 1993, employee interviews in 1994, and a Phase II RI in 1996. During the investigations, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and polynuclear aromatic hydrocarbons (PAHs) were detected at concentrations below residential preliminary remediation goals (PRGs). The maximum arsenic concentration was detected at a depth

of 8-10 feet below ground surface (bgs) and was above the former MCAS El Toro background concentration for arsenic. The RI of the site indicated that the site-related contamination is limited to the shallow soil interval. The human health and ecological risk assessments indicated that the contaminants present in the soil do not present an unacceptable risk to human health or the environment. Therefore, no remedial action is required. A ROD for NFA was signed on 30 September 1997 (DON 1997). Site 6 has been assigned an ECP area type of Category 3.

#### 4.1.2.2 SITE 13 – OIL CHANGE AREA

IRP Site 13 encompasses approximately 34,000 square feet and is bounded on the north by Former Tank Farm No. 2 and on the south by the storage yard for Building 242. The site is situated within Transfer Parcel III-A and Carve-out III-B (see Figure 2 for carve-out locations). The site is relatively flat, unpaved, and generally unvegetated. Site 13 consists of two units: Unit 1 comprises the area southeast of Tank Farm No. 2 and Unit 2 comprises the area southwest of Tank Farm No. 2. Trucks were driven to the area southeast of the tank farm (Unit 1) for oil changes, and crank case oil was frequently drained onto the ground. From 1977 to 1983, approximately 7,000 gallons of waste oil were drained onto the ground. The oily soil was subsequently removed, and no visible evidence of the oily soil remains. A review of aerial photographs indicated heavy staining throughout the area between the tank farm and Building 242 (Unit 2), which persisted over the years of photographic record. It is likely that oil changes were also conducted in that area.

Investigations conducted at the site included an RFA, a Phase I RI and aerial photographic surveys in 1993, and employee interviews in 1994. VOCs, SVOCs, PAHs, and pesticides were detected at concentrations below residential PRGs. Arsenic was detected at concentrations above the industrial PRG from the surface to a depth of 80 feet bgs. The maximum arsenic concentration was below the former MCAS El Toro background concentration. Total recoverable petroleum hydrocarbons (TRPH) was detected at the soil surface and at a depth of 5 feet bgs. Based on the results of the Phase I RI investigation, a Phase II RI was not recommended. The RI of the site indicated that the site-related contamination is limited to the shallow soil interval. The human health and ecological risk assessments showed that the contaminants present in the soil do not present an unacceptable risk to human health or the environment. Therefore, the selected remedy in the ROD signed on 30 September 1997, for Site 13 was no action. No deed restrictions were recommended for Site 13 due to chemicals present in the soil. However since the groundwater beneath Site 13 was contaminated by trichloroethylene (TCE) and tetrachloroethylene (PCE; also perchloroethylene) due to Site 24 - VOC source area, when the NFA ROD was signed in 1997, the use restrictions prohibiting drilling of wells and/or extraction of groundwater and allowing access for groundwater monitoring and maintenance of equipment associated with groundwater remediation were to be addressed in the ROD for OU-1 Site 18 and OU-2A Site 24 (DON 1997). When the Final ROD for OU-1 Site 18 and OU-2A Site 24 was completed in 2002 (DON 2002b), the updated VOC plume and 500 foot buffer zone were no longer located beneath Site 13. Consequently, groundwater restrictions due to the Site 24 VOC plume are no longer applicable for Site 13.

A ROD for NFA was signed on 30 September 1997 (DON 1997). Site 13 has been assigned an ECP area type of Category 3. NFA is required.

#### 4.1.2.3 SITE 19 – AIRCRAFT EXPEDITIONARY REFUELING SITE

IRP Site 19 is within Transfer Parcel II-A and encompasses approximately 4 acres southwest of Buildings 404 and 414. Between 1964 and 1986, the site operated as a fuel-storage and fuel-dispensing area. The site consisted of six 20,000-gallon JP-5 fuel bladders in 4-foot-high earthen revetments and associated piping and fuel-dispensing equipment. The site originally consisted of four units:

- Unit 1, Northeast Stained Area (later removed under the CERCLA petroleum exclusion)
- Unit 2, Excavated Areas
- Unit 3, Stained Area Around Excavations
- Unit 4, Pump Station (this area was added for the Phase II RI and then was removed under the CERCLA petroleum exclusion).

Various spills and leaks reportedly occurred during operation of the site. In one instance, an estimated 20,000 gallons of JP-5 were reportedly released after a bladder rupture. Petroleum hydrocarbons were detected in the soil beneath the ruptured bladder.

The fuel bladders were removed in 1986, and the soil was excavated to a maximum depth of 15 feet bgs in a 30-foot-square area beneath the location of the bladder rupture (Unit 2). The excavation was partially backfilled to a depth of approximately 11 feet in 1994. The backfill material consisted of soil containing PCBs that originated from Site 8, Unit 3. Prior to backfill, soil samples were collected within the excavated area, i.e., Unit 2 of Site 19. No chemicals of potential concern were detected at concentrations greater than U.S. EPA industrial PRGs as stated in The Final Action Memorandum, Non-time Critical Removal Action for Unit 2 of Site 19 (and revisions dated 25 September 1996) (Bechtel National, Inc. [BNI] 1996). In 1996, the remaining excavation was backfilled to grade the surrounding area with clean fill material. An additional 19,000-square-foot area beneath the locations of the other bladders was also excavated in 1986 to a depth of approximately 2.5 feet. This area has yet to be backfilled and is now heavily vegetated. All of the buildings/structures/facilities at the site were removed following site closure and were replaced by a pump station and UST complex situated adjacent to the east side of the site.

Investigations conducted at the site included a Phase I RI and aerial photograph surveys in 1993, employee interviews in 1994, and a Phase II RI in 1996. Unit 1 was excluded from the IRP under the CERCLA petroleum exclusion in 1995 (closed by RWQCB in a letter dated 14 May 1997), and Unit 4 was excluded from the IRP under the CERCLA petroleum exclusion in 1997 (Unit 4 is being addressed with USTs 891A, 891B, and 891C, and the associated area is therefore unsuitable for transfer and is not part of this FOST). The investigations indicated SVOCs at concentrations below residential PRGs, with the exception of benzo(a)pyrene, which was above the industrial PRG value. VOCs were detected at concentrations below residential PRGs. Arsenic was detected at concentrations above the industrial PRG value, and the maximum arsenic value was above the former MCAS El Toro background concentration.

The backfill material originating from Site 8, Unit 3 was characterized while it was temporarily stockpiled, before being moved to Site 19, Unit 2. Ten randomly selected soil samples from the stockpile of approximately 229 cubic yards were reported with PCB concentrations greater than residential PRGs. The reported PCB concentrations were 0.5, 1.7, 3.7, 4.6, 5.9, 6.0, 10.0, 12.0, 17.1, and 20.0 milligrams per kilogram (mg/kg) (BNI 1996).

The human health and ecological risk assessments showed that the contaminants present in the soil do not present an unacceptable risk to human health or the environment. An NFA ROD was signed on 30 September 1997 (DON 1997). Site 19 has been assigned an ECP area type of Category 4 because all required response actions have been completed, and NFA is required.

#### 4.1.2.4 SITE 20 – HOBBY SHOP

IRP Site 20 is within Transfer Parcel I-A. It encompasses approximately 0.5 acre immediately northwest of the intersection of North 9th Street and West Marine Way and includes Building 626. Beginning in 1967, the site was used as an auto shop for military personnel to service and repair

privately owned vehicles. Kerosene was reportedly used to wash down the paved area at the site until approximately 1976. The wash runoff drained into a catch basin situated in the entry driveway and finally drained into an oil/water separator (OWS). From 1976 until closure of the Hobby Shop in 1999, a biodegradable soap was used in place of kerosene.

Site 20 originally consisted of four units:

- Unit 1 - Shallow Drainage Swale (1-2 feet below grade), adjacent to the east side of Building 626.
- Unit 2 - South Drainage Ditch, runs along North 9th Street (this unit was later removed from the IRP under the CERCLA petroleum exclusion).
- Unit 3 - Stained Area, small area adjacent to the northwest side of Building 626 (this unit was later removed from the IRP under the CERCLA petroleum exclusion).
- Unit 4 - Inner Courtyard of Building 626, an entry driveway, and a front-sloping area adjacent to the drainage ditch along North 9th Street. The inner portion is paved with asphalt. The entry driveway is concrete and crosses over the drainage ditch. The front area is covered with grass with some bare spots and various trees.

Investigations at the site included an RFA, a Phase I RI, aerial photograph surveys in 1993, and a Phase II RI in 1996. In 1997, Units 2 and 3 were excluded from the site based on the CERCLA petroleum exemption. Soil sampling identified VOCs, SVOCs, PCBs, and pesticides at the site, all below residential PRGs. Arsenic was detected at concentrations above the former MCAS El Toro background value. The RI of the site indicated that the site-related contamination is limited to the shallow soil interval. The human health and ecological risk assessments showed that the contaminants present in the soil do not present an unacceptable risk to human health or the environment. Therefore, no remedial action is required. An ROD for NFA was signed on 30 September 1997 (DON 1997). Site 20 has been assigned an ECP area type of Category 3.

#### 4.1.2.5 SITE 25 – MAJOR DRAINAGES

IRP Site 25 encompasses approximately 22 acres and comprises the four major washes that flow through former MCAS El Toro. These include Agua Chinon Wash, Bee Canyon Wash, Borrego Canyon Wash, and Marshburn Channel. Three of these drainages (Agua Chinon Wash, Bee Canyon Wash, and Borrego Canyon Wash) are continuations of natural washes that originate in the Santa Ana Mountains. Surface drainage from the hills and upgradient irrigated farmland combines with runoff generated from extensive paved surfaces at former MCAS El Toro. The on-station storm sewer system discharges to the drainage channels, which then flow into San Diego Creek. San Diego Creek discharges into upper Newport Bay, about 7 miles downstream from its intersection with Marshburn Channel. These washes traverse Transfer Parcels I-A, II-A, and III-A, and also traverse property not suitable for transfer.

IRP Site 25 was included as part of OU-2A because discharges to the drainages have the potential to contaminate regional groundwater. The site was constituted before the source of the regional VOC groundwater contamination had been identified as IRP Site 24. The site was identified for a Phase II RI, but the drainages were investigated as part of the Phase I RI for Sites 18 and 24 to evaluate the source of the off-site VOC groundwater plume. Potential contamination within the major drainages and San Diego Creek was assessed by analyzing surface water, sediment, soil, and soil gas samples. Except for the Borrego Canyon Wash, metals and pesticides were detected above former MCAS El Toro background concentrations in all drainages. Significant petroleum hydrocarbon contamination was detected at depths of 15 to 20 feet bgs at the southern end of Agua Chinon Wash, near the former MCAS El Toro boundary. Within the Agua Chinon Wash, total petroleum hydrocarbons

(TPH) were detected at depths up to 57 feet bgs. The RI of the site indicated that the site-related contamination is limited to sediment and surface water. The human health and ecological risk assessments showed that the contaminants present in these media do not present an unacceptable risk to human health or the environment. Therefore, no remedial action is required. The Draft Final RI Report was completed in 1997, and the ROD for NFA was signed on 30 September 1997 (DON 1997). Site 25 has been assigned an ECP area type of Category 3.

#### **4.1.3 AST/UST LOCs**

A total of 211 AST and UST sites are situated within the proposed transfer parcels. These include 9 ASTs and 202 USTs. These ASTs and USTs have received regulatory concurrence for NFA decisions. These are described in Table 7 and tank locations are shown on Figures 5a-5c.

The UST NFA determination letters from the OCHCA and RWQCB state that they had concluded under Title 23 CCR Section 2721(e) that NFA was required (presented in Attachment 1). NFA was necessary in order to "adequately protect human health, safety, and the environment" (Title 23 CCR §2720).

#### **4.1.4 Wastewater Treatment and Related System LOCs**

A total of 21 wastewater treatment and related system LOCs that have received regulatory agency concurrence for NFA decisions are present within the proposed transfer parcels. These include 16 OWSs, 3 wash racks, and 2 septic tanks. The OWSs and wash racks are described in Tables 8 and 9. The septic tanks (RFAs 305 and 306) are described in Table 3. The OWSs, wash racks, and septic tanks are shown in Figures 6a and 6b.

#### **4.1.5 PCB-Containing Transformer and Non-Transformer PCB Equipment LOCs**

A total of 70 PCB-containing transformer locations and 8 non-transformer PCB items that have received regulatory agency concurrence for NFA decisions have been identified within the proposed transfer parcels. These PCB-Containing Transformer and Non-Transformer PCB Equipment LOCs are described in Tables 10 and 11 and are shown on Figures 7a-7c. Any PCB-containing transformers that have been replaced, as listed in Table 10, were replaced with non-PCB-containing transformers.

#### **4.1.6 Miscellaneous LOCs**

Seven miscellaneous LOCs that have received regulatory agency concurrence for NFA decisions are present on the proposed transfer parcels. These miscellaneous LOCs are described in Table 12 and are shown on Figures 8a and 8b.

### **4.2 ENVIRONMENTAL CONCERNS WITHIN PARCELS SUITABLE FOR TRANSFER**

Environmental concerns with regard to property categorization factors are described below for each of the proposed transfer parcels. Typically, property categorization factors include hazardous substances, IRP sites, storage tanks and pipeline systems, wastewater treatment and related systems, PCBs, medical/biohazardous waste, ordnance, pesticides, and miscellaneous sites. These factors correlate to the different LOC categories that were developed as part of the various environmental investigations conducted at former MCAS El Toro. Some property categorization factors encompass multiple LOC categories and correspond to the way the findings have been presented in the EBS. Only LOCs that have been identified in the EBS for these property categorization factors are discussed below. Property categorization factors for which no LOCs were identified are not included in this discussion.

#### 4.2.1 Transfer Parcel I-A

Transfer Parcel I-A is approximately 809.5 acres. This parcel contains 225 non-demolished buildings/structures/facilities which includes the units located in the Saddleback Terrace housing area. Transfer Parcel I-A also includes hazardous substance LOCs, IRP site LOCs, AST/UST LOCs, wastewater treatment and related system LOCs, PCB LOCs, and miscellaneous LOCs. The environmental concerns related to these sites are discussed below.

##### 4.2.1.1 HAZARDOUS SUBSTANCE LOCs IN TRANSFER PARCEL I-A

Types of hazardous substance LOCs within Transfer Parcel I-A include RFA sites, TAA sites, and APHO sites. These are described in the following paragraphs and shown in Figure 3d.

**RFA Sites.** There are 6 RFA sites within Transfer Parcel I-A. In addition, 2 other stationwide sites, RFA 12 and RFA 247, are present in Transfer Parcel I-A and also occur in Transfer Parcels II-A and III-A. Details regarding these RFA sites are provided in Table 3.

**TAA Sites.** There are 5 TAA sites within Transfer Parcel I-A. Details regarding these TAA sites are provided in Table 4.

**APHO Sites.** There are 19 APHO sites within Transfer Parcel I-A. In addition, a portion of one site, APHO 83 is located in this transfer parcel and Transfer Parcel II-A. Details regarding these sites are provided in Table 5.

##### 4.2.1.2 IRP LOCs IN TRANSFER PARCEL I-A

IRP Site 20 and portions of IRP Site 25 are situated within Transfer Parcel I-A. A description of these IRP Sites is provided in Table 6 and Section 4.1.2, and shown in Figure 4.

##### 4.2.1.3 AST/UST LOCs IN TRANSFER PARCEL I-A

There are 5 AST sites and 116 UST sites within Transfer Parcel I-A. Details regarding these storage tanks are presented in Table 7 and shown in Figure 5c.

##### 4.2.1.4 WASTEWATER TREATMENT AND RELATED SYSTEM LOCs IN TRANSFER PARCEL I-A

Types of wastewater treatment system LOCs within Transfer Parcel I-A include OWSs, wash racks, and septic tanks. These are described in the following paragraphs and shown in Figure 6b.

**OWSs.** There are 10 OWSs situated within Transfer Parcel I-A. Details regarding these OWSs are provided in Table 8.

**Wash Racks.** A total of 2 wash racks are situated within Transfer Parcel I-A. Details regarding these wash racks are provided in Table 9.

**Septic Tank.** Two septic tanks (RFAs 305 and 306) are situated within Transfer Parcel I-A. Details regarding these septic tanks are provided in the RFA Table, Table 3.

##### 4.2.1.5 PCB-CONTAINING TRANSFORMERS AND EQUIPMENT LOCs IN TRANSFER PARCEL I-A

A total of 43 PCB-containing transformer locations and 3 non-transformer PCB equipment items have been identified within Transfer Parcel I-A and shown in Figure 7c. All PCB-containing transformers containing concentrations of PCBs of 50 parts per million (ppm) or greater have been removed or replaced with non-PCB transformers. Details regarding these transformers and items are

provided in Tables 10 and 11 respectively. No evidence of a release has been identified for any of these transformers or equipment.

#### 4.2.1.6 MISCELLANEOUS LOCs IN TRANSFER PARCEL I-A

Four miscellaneous LOCs are situated within Transfer Parcel I-A. Details regarding these sites are provided in Table 12 and shown in Figure 8b.

### 4.2.2 Transfer Parcel II-A

Transfer Parcel II-A is approximately 1,439.6 acres. This parcel contains a golf course and 1,078 non-demolished buildings/structures/facilities which include the units located in San Joaquin, Vista Terrace, Navy/Marine (NAMAR), and Wherry housing areas. Transfer Parcel II-A also includes hazardous substance LOCs, IRP Site LOCs, AST/UST LOCs, wastewater treatment and related system LOCs, PCB LOCs, and miscellaneous LOCs. The environmental concerns related to these sites are discussed below.

#### 4.2.2.1 HAZARDOUS SUBSTANCE LOCs IN TRANSFER PARCEL II-A

Types of hazardous substance LOCs within Transfer Parcel II-A include RFA sites, TAA sites, and APHO sites. These are described in the following paragraphs and shown in Figures 3a, 3b, and 3d.

**RFA Sites.** There are 17 RFA sites within Transfer Parcel II-A. In addition, 2 other stationwide sites, RFA 12 and RFA 247, are present in Transfer Parcel II-A and also occur in Transfer Parcels I-A and III-A. Details regarding these RFA sites are provided in Table 3.

**TAA Sites.** There are 7 TAA sites within Transfer Parcel II-A. Details regarding these TAA sites are provided in Table 4.

**APHO Sites.** There are 47 APHO sites within Transfer Parcel II-A. In addition, a portion of APHO 83 is located in this transfer parcel and Transfer Parcel I-A and a portion of APHO 8 is located in this transfer parcel and Transfer Parcel III-A. Details regarding these sites are provided in Table 5.

#### 4.2.2.2 IRP SITE LOCs IN TRANSFER PARCEL II-A

IRP Sites 6 and 19 and portions of IRP Site 25 are situated within Transfer Parcel II-A. A description of these IRP Sites is provided in Table 6 and Section 4.1.2 and shown in Figure 4.

#### 4.2.2.3 AST/UST LOCs IN TRANSFER PARCEL II-A

There are 4 AST sites and 77 UST sites within Transfer Parcel II-A. Details regarding these storage tanks are presented in Table 7 and shown in Figures 5a and 5b.

#### 4.2.2.4 WASTEWATER TREATMENT AND RELATED SYSTEM LOCs IN TRANSFER PARCEL II-A

Types of wastewater treatment system LOCs within Transfer Parcel II-A include OWSs and wash racks. These are described in the following paragraphs and shown in Figure 6a.

**OWSs.** There are 6 OWS situated within Transfer Parcel II-A. Details regarding this OWS are provided in Table 8.

**Wash Racks.** One wash rack is situated within Transfer Parcel II-A. Details regarding this wash rack are provided in Table 9.



#### 4.2.2.5 PCB-CONTAINING TRANSFORMERS AND EQUIPMENT LOCs IN TRANSFER PARCEL II-A

A total of 27 PCB-containing transformer locations and 5 non-transformer PCB equipment items have been identified within Transfer Parcel II-A and shown in Figures 7a and 7b. All PCB-containing transformers containing concentrations of PCBs of 50 ppm or greater have been removed or replaced with non-PCB transformers. Details regarding these transformers and items are provided in Tables 10 and 11, respectively.

#### 4.2.2.6 MISCELLANEOUS LOCs IN TRANSFER PARCEL II-A

Three miscellaneous LOC are situated within Transfer Parcel II-A. Details regarding this site are provided in Table 12 and shown in Figure 8a.

### 4.2.3 Transfer Parcel III-A

Transfer Parcel III-A is approximately 329.0 acres. This parcel contains 10 non-demolished buildings/structures/facilities and includes hazardous substance LOCs, an IRP LOC, and AST/UST LOCs. The environmental concerns related to these sites are discussed below.

#### 4.2.3.1 HAZARDOUS SUBSTANCE LOCs IN TRANSFER PARCEL III-A

Types of hazardous substance LOCs within Transfer Parcel III-A include RFA sites, and APHO sites. These are described in the following paragraphs and shown in Figures 3b, 3c, and 3d.

**RFA Sites.** There is one RFA site within Transfer Parcel III-A. In addition, 2 other stationwide sites, RFA 12 and RFA 247, are present in Transfer Parcel III-A and also occur in Transfer Parcels I-A, and II-A. Details regarding these RFA sites are provided in Table 3.

**APHO Sites.** There are 2 APHO sites within Transfer Parcel III-A. In addition, a portion of one site, APHO 8, is located in this transfer parcel and also occurs in Transfer Parcel II-A. Details regarding these sites are provided in Table 5.

#### 4.2.3.2 IRP SITE LOCs IN TRANSFER PARCEL III-A

Portions of both IRP Site 25 and IRP Site 13 are situated within Transfer Parcel III-A. A description of these IRP Sites is provided in Table 6 and Section 4.1.2 and shown in Figure 4.

#### 4.2.3.3 AST/UST LOCs IN TRANSFER PARCEL III-A

There are no ASTs and 9 UST sites within Transfer Parcel III-A. Details regarding these storage tanks are presented in Table 7 and shown in Figure 5c.

### 4.2.4 Transfer Parcel IV

Transfer Parcel IV is approximately 219.4 acres. This parcel does not include any buildings/structures/facilities or LOCs.

## 5. NOTIFICATIONS AND RESTRICTIONS

The analysis conducted for the EBS identified environmental factors that may have impacted property within the parcels proposed for transfer. Section 4.0 describes the environmental concerns associated with each of the parcels proposed for transfer. The evaluation identified existing environmental concerns that may warrant notifications and/or restrictions on certain activities to ensure that post-transfer use of the FOST areas is consistent with protection of human health and the environment. A discussion of notification(s) and/or restriction(s) for environmental factors is presented in this section. Table 13 provides a list of environmental factors considered for this FOST. Restrictions discussed in this FOST will be incorporated into the deeds of affected properties within the FOST areas.

Pursuant to CERCLA Section 120(h)(3)(A)(i) and provisions of 40 Code of Federal Regulations Part 373, the deed for each parcel will contain a notice of hazardous substances stored, released, or disposed of, if any, within each such transfer parcel at the former MCAS El Toro. This notice is provided in Attachment 2 - Hazardous Substances and Petroleum Products Notification Tables. The Petroleum Products Notification Table lists the LOCs associated with petroleum products only, which are within the scope of the CERCLA Petroleum Exclusion set forth in CERCLA Section 101(14).

### 5.1 SCHOOL SITE CONSIDERATIONS

#### Notifications

If, subsequent to transfer, any portion of the property found suitable for transfer by this FOST is considered for the proposed acquisition and/or construction of school properties utilizing state funding, a separate environmental review process in compliance with the California Education Code section 17210 et seq. will need to be conducted by the transferee and approved by DTSC (School Property Evaluation and Cleanup Division). The California Education Code requires that a comprehensive evaluation of natural and manmade hazardous materials be conducted for school properties. This comprehensive evaluation requires additional investigation of hazardous materials outside the scope of CERCLA hazardous substances. This additional evaluation includes: legally applied pesticides and herbicides, imported fill materials, naturally occurring hazardous substances such as heavy metals (e.g., chromium, mercury, nickel), metalloids (e.g., arsenic, selenium), gases (e.g., methane, hydrogen sulfide), and radioactive elements (e.g., radon gas) and naturally occurring petroleum deposits. The evaluation also includes asbestos-containing material (ACM) and lead-based paint (LBP) at concentrations that fall outside the scope of CERCLA. Any requirements associated with the evaluation of any property for compliance with the California Education Code are the sole responsibility of the transferee.

### 5.2 HAZARDOUS SUBSTANCES AND PETROLEUM PRODUCTS

#### Notifications

Past activities within the parcels proposed for transfer included the use and storage of hazardous substances and petroleum products. There is a potential for releases of hazardous substances and petroleum products to have occurred during these activities. A notice of hazardous substances and petroleum products stored, released, or disposed of at specific sites within the parcels proposed for transfer is provided in Attachment 2 - Hazardous Substances and Petroleum Products Notification Tables.

Hazardous substance LOCs situated within the parcels proposed for transfer include RFA sites, TAA sites, and APHO sites. Summary information, including regulatory agency action, for the 108 hazardous substance LOCs that are situated within the parcels proposed for transfer is presented in Tables 3, 4, and 5. Hazardous substance LOCs are situated in Transfer Parcels I-A, II-A, and III-A. The hazardous substance LOC locations are shown on Figures 3a-3d.

### **Restrictions**

Because all hazardous substance LOCs within the parcels proposed for transfer have received regulatory agency concurrence on NFA decisions and are suitable for residential use, there are no restrictions due to hazardous substance LOCs.

## **5.3 IRP SITES**

### **Notifications**

Five IRP sites for which regulatory agency concurrence on NFA decisions have been received are situated within the parcels proposed for transfer. These sites, IRP Sites 6, 19, and 20, and portions of both IRP Sites 13 and 25 (portions that are not within carve-out areas), are described in Table 6 and Section 4.1. Investigations/remedial actions at these sites have identified or lowered contaminant concentrations to levels that do not pose an unacceptable threat to human health or the environment. These sites are situated in Transfer Parcels I-A, II-A, and III-A. Their locations are shown on Figure 4.

### **Restrictions**

Because all IRP sites within the parcels proposed for transfer have received regulatory agency concurrence on NFA decisions and are suitable for residential use, there are no restrictions due to IRP sites.

## **5.4 USTs/ASTs**

### **Notifications**

Past activities within the parcels proposed for transfer included the use of storage tanks. Summary information for the 211 UST/AST sites that are situated within the parcels proposed for transfer is presented in Table 7. Storage tank sites are situated within Transfer Parcels I-A, II-A, and III-A. The UST/AST site locations are shown on Figures 5a-5c. A notice of hazardous substances and petroleum products stored, released, or disposed of at specific sites within the parcels proposed for transfer is provided in Attachment 2 - Hazardous Substances and Petroleum Products Notification Table.

### **Restrictions**

Because all AST and UST sites within the parcels proposed for transfer have received regulatory agency concurrence on NFA decisions and are suitable for residential use, there are no restrictions due to AST and UST sites.

## 5.5 WASTEWATER TREATMENT AND RELATED SYSTEMS

### Notifications

Wastewater treatment and related system LOCs situated within the parcels proposed for transfer include OWSs, wash racks, and septic tanks. Summary information, including regulatory agency action, for the 21 wastewater treatment and related system LOCs that are situated within the parcels proposed for transfer is presented in Table 3 for septic tanks (RFAs 305 and 306) and Tables 8 and 9 for OWSs and wash racks. Wastewater treatment and related system LOCs are situated in Transfer Parcels I-A and II-A and are shown on Figures 6a and 6b.

### Restrictions

Because all wastewater treatment and related system LOCs within the parcels proposed for transfer have received regulatory agency concurrence on NFA decisions and are suitable for residential use, there are no restrictions due to wastewater treatment and related system LOCs.

## 5.6 PCBs

### Notifications

**PCB-Containing Transformers and PCB-Containing Transformer/Equipment Storage Areas.** The EBS identified 70 PCB-containing transformer locations within the parcels proposed for transfer. No transformers containing concentrations of PCBs of 50 ppm or greater are present. Former PCB-containing transformers within the parcels proposed for transfer are listed in Table 10. Former PCB-containing transformer locations are present in Transfer Parcels I-A and II-A. Their locations are shown on Figures 7a-7c.

**Non-Transformer PCB Equipment.** A 1992 survey of MCAS El Toro for items and equipment, other than transformers and fluorescent light fixtures, that possibly contained PCBs was conducted (Kennedy/Jenks Consultants 1992). The survey identified items suspected of containing PCB insulation or fluid. Within the parcels proposed for transfer, 8 items contained dielectric fluid and were sampled and analyzed for PCB concentrations. Table 11 lists these items and the analytical results. All items contained concentrations of PCBs below 50 ppm. Non-transformer PCB equipment locations are present in Transfer Parcels I-A and II-A. Their locations are shown on Figures 7a-7c. Because these items contain PCBs below 50 ppm, they are classified by the Toxic Substances Control Act (TSCA) as non-PCB items and are not required to be removed from service.

**PCB Light Fixtures.** Ballasts in fluorescent light fixtures made prior to 1979 may contain sealed PCB-containing components. A survey of station buildings/structures/facilities for PCB-containing light ballasts has not been conducted; however, it is assumed that buildings/structures/facilities constructed prior to 1979 have PCB light fixtures. It should be noted that many buildings/structures/facilities that were constructed prior to 1979 have had interior renovations and new light fixtures installed that do not contain PCBs.

Fluorescent light ballasts manufactured before 1979 often contain PCB small capacitors that may be disposed of as municipal solid waste. No action is required at the buildings/structures/facilities unless large quantities of PCB-containing fluorescent light ballasts are removed. According to DON guidance on disposal of fluorescent light ballasts containing PCBs (DON 1989), when a large quantity of PCB small capacitors needs to be disposed of, such as when the fixtures in a large office or an entire building/structure/facility are replaced, they should be handled as regulated PCB equipment.

Fluorescent light ballasts that contain PCBs have approximately 1.0 to 1.5 ounces of PCB fluid in each capacitor. There are approximately 3.1 to 4.7 pounds of PCB fluid for every 50 PCB small capacitors in fluorescent light ballasts.

### **Restrictions**

Because no releases of PCBs have been identified from PCB transformers (release at T56 has been cleaned up) and non-transformer PCB equipment within the parcels proposed for transfer, there are no restrictions due to PCBs.

## **5.7 MEDICAL/BIOHAZARDOUS WASTE**

### **Notifications**

Medical/biohazardous waste generated at medical and dental clinics at former MCAS El Toro were handled and transported off station for incineration by a commercial waste disposal contractor. Based on the real property record for former MCAS El Toro, Building 876, Zoonosis Central Clinic, in Transfer Parcel I-A has been identified as a previous medical clinic. No documentation or evidence of a release of medical/biohazardous waste was identified (Earth Tech 2003).

### **Restrictions**

There are no restrictions due to medical/biohazardous waste.

## **5.8 ORDNANCE**

### **Notifications**

The parcels proposed for transfer include buildings/structures/facilities where ordnance was formerly stored/used. The 21 ordnance-related buildings/structures/facilities within these parcels include Building 794 in Transfer Parcel I-A, Buildings 136, 163, 164, 166, 167, 169 to 172, 291, 440, 611, 826, and 841 in Transfer Parcel II-A, and demolished Buildings 141, 160-162, 168, and 173 (formerly located in Transfer Parcel II-A). The maintenance and inspection of munitions are regulated under the DoD Ammunition and Explosives Safety Standards, DoD 6055.9 STD. The strict storage requirements, the construction of the munitions storage facilities, and the design of the munitions would have minimized the potential for releases of explosives to the environment. No past releases of ordnance or explosives to the environment have been identified. All environmental investigations conducted at the former MCAS El Toro have indicated that ordnance and/or explosive hazards do not remain on the property (Earth Tech 2003).

### **Restrictions**

There are no restrictions due to unexploded ordnance or releases of explosives to the environment.

## **5.9 PESTICIDES**

### **Notifications**

Agricultural areas are present within the areas proposed for transfer. The following discussion provides notifications that are required based on previous use of pesticides at these areas.

Pesticide application on agricultural lease areas (approximately 580 acres) in Transfer Parcels I-A, II-A, III-A, and IV is performed by the lessee. These areas have been predominantly used for

agricultural purposes since before the inception of the installation. The lessee is responsible for complying with applicable federal, state, and county standards for the prevention, control, and abatement of environmental pollution. Pesticides are applied in accordance with DoD requirements for safety, effectiveness, and environmental protection. The lessee is responsible for obtaining any state or county permits for application of pesticides. Only those pesticides reported to and approved by DON can be utilized. Available documentation was reviewed and visual site inspections (VSIs) were conducted in support of the EBS to evaluate potential inappropriate handling or application of pesticides in the agricultural lease areas. No evidence of any such inappropriate uses was identified or observed. Soil sampling that was conducted in the agricultural lease areas in 1994, 2002, and 2003 did not identify elevated concentrations of pesticides in the areas proposed for transfer (JEG 1995b; Earth Tech 2003) with the exception of the pesticide storage area at Bordier's Nursery. Based on these results, the agricultural areas in Transfer Parcels I-A, II-A, III-A, and IV are considered ECP Category 1 for pesticides. However, based on the results of the additional sampling that was conducted during 2003 at the Bordier's Nursery (Parcel I-A) pesticide storage area, this specific area has been classified ECP Category 3 for pesticides (Earth Tech 2003).

In addition to being used on the agricultural areas, pesticides have also been used at former MCAS El Toro to control rodents and weeds. A certified pest control contractor was utilized to control roaches, spiders, ants, and other pests.

Pesticides and herbicides are currently stored within Building 817 (Transfer Parcel II-A) at the golf course. Pesticides and herbicides are ordered on an as-needed basis to keep the quantity of pesticides stored to a minimum. The VSI conducted in 2002 in support of the 2003 EBS did not identify any evidence of improper storage or release of pesticides. Types of pesticides identified within Building 817 during the 2002 VSI include:

- Roundup® (1, 1-gallon container)
- Ferrous Sulfate (15, 40-pound bags)
- Fungicide (20, 0.5-gallon containers)
- Delta Guard Insecticide® (20, 0.5-gallon containers)
- Trimec Weed Control® (3, 1-gallon containers)
- Scotts Fungicide X® (2, 40-pound bags)
- Scotts Insecticide III® (1, 40-pound bag)

At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property. Attachment 2b summarizes past pesticide use on the property.

### **Restrictions**

There are no restrictions due to prior pesticide storage or usage.

## **5.10 MISCELLANEOUS LOCs**

### **Notifications**

Seven miscellaneous LOCs are situated within the parcels proposed for transfer. Summary information, including regulatory agency action, for these LOCs is presented in Table 12.

Miscellaneous LOCs are situated in Transfer Parcels I-A and II-A. Their locations are shown on Figures 8a and 8b.

### **Restrictions**

Because all miscellaneous LOCs within the parcels proposed for transfer have received regulatory agency concurrence on NFA decisions and are suitable for residential use, there are no restrictions due to miscellaneous LOCs.

## **5.11 ASBESTOS-CONTAINING MATERIAL**

DoD policy with regard to ACM is to manage ACM in a manner protective of human health and the environment, and to comply with all applicable federal, state, and local laws and regulations governing ACM hazards (DoD 1994a). Therefore, unless it is determined by competent authority that the ACM in the property poses a threat to human health at the time of transfer, all property containing ACM will be conveyed, leased or otherwise conveyed "as is" through the BRAC process. ACM is considered to be a threat to human health if it is located within the interior of a building/structure/facility, and is friable, accessible, and damaged (FAD). DoD policy with respect to ACM is contained in Attachment 3.

Prior to property disposal, all available information on the existence, extent, and condition of ACM shall be provided via the EBS report or other appropriate document to be provided to the transferee. The survey report or document will include:

- Reasonably available information on the type, location, and condition of asbestos in any building/structure/facility or improvement on the property
- Available results of testing for asbestos, including results of a site-specific FAD ACM survey performed to revalidate the condition of the ACM
- A description of asbestos control measures taken for the property
- Available information on costs or time necessary to remove remaining ACM; however, special studies or tests to obtain this information will not be provided by DON.

As a general matter, DON will perform asbestos surveys when a building/structure/facility is scheduled for reuse, or if its status is to be determined. DON is not required to conduct a FAD ACM survey if a plan for reuse calls for a building/structure/facility to be demolished. For buildings/structures/facilities at former MCAS El Toro, DON anticipates all or nearly all such buildings/structures/facilities will be demolished by the transferee(s). Furthermore, a FAD ACM survey is not required if ACM has never been identified in the interior of a building/structure/facility during previous asbestos surveys, or if an asbestos survey conducted after 31 December 1996, found no damaged ACM and there is no reason to suspect that damaged ACM is present. Therefore, rather than perform new surveys for all buildings/structures/facilities, use or occupancy of buildings/structures/facilities for which DON would otherwise perform new surveys will be restricted pending (1) performance of asbestos surveys and any necessary abatement, or (2) demolition by transferee(s).

NFECSW SDIEGO believes that it is a sound practice to reinspect ACM to assess its physical condition (i.e., good or damaged) every 3 years when there are still active operations underway at an installation. This is consistent with the approach taken to address similar issues under the Asbestos Hazard Emergency Response Act. Since base closure occurred in 1999 and activity that could potentially damage ACM ceased then, qualified inspections performed after 1 January 1997, or later

in buildings/structures/facilities that have been vacant since closure are considered to be in conformance with this approach.

With respect to buildings/structures/facilities which will be reused, ACM in such buildings/structures/facilities shall be remediated prior to property disposal (or as a condition of transfer) only if it is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time of transfer of the property (i.e., FAD ACM). This remediation shall be accomplished by DON or by the transferee under a negotiated requirement of the property transfer. Occupancy or use of buildings/structures/facilities with FAD ACM will be restricted until abatement has been completed.

When buildings/structures/facilities are scheduled for demolition by the transferee, the transfer document shall prohibit occupation of the buildings/structures/facilities prior to demolition. Buildings/structures/facilities that are to be demolished may be occupied on an interim basis only if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements. The transferee shall assume responsibility for the management of any ACM, including surveys, removal and/or management of ACM prior to or during demolition, in accordance with applicable laws.

Certain residential buildings/structures/facilities within the parcels proposed for transfer have been designated for potential reuse for residential purposes or as a child-occupied building/structure/facility. These residential buildings/structures/facilities consist of 168 units within the Wherry Housing area and Building 834. DON completed an ACM survey in July/August 2003 for these Wherry Housing units as well as Buildings 322, 834, and part of the stables area, which are all projected for potential reuse. Table 15 of this report provides information from this ACM survey. Building 322 is part of the non-transferable Carve-out III-B and is not discussed further in this FOST. This survey updated the previous ACM survey for Wherry Housing that was documented in the 27 November 1995 report prepared by the Navy Public Works Center (PWC) (PWC 1995b). The previous report identified two types of linoleum in the interior and one type of black roofing tar/mastic on the exterior of the housing units as ACM. Roofing mastic had been found at all housing units; however, the previous report did not indicate in which specific housing units the ACM linoleum was located, the report only described (by the pattern on the flooring) the types of linoleum flooring that were identified as ACM. Accordingly, during the recent inspection, any linoleum flooring containing FAD ACM was identified by its pattern and/or color in accordance with the pattern descriptions provided in the 1995 PWC report (PWC 1995b).

For the 2003 survey, ACM linoleum was assumed to be friable based on the 1995 survey results. The 2003 survey was, therefore, conducted by examining each of the 168 Wherry Housing units for damaged ACM linoleum flooring, and documenting the location, damaged quantity, and total quantity of material identified. For Building 834 and the stables area, the survey noted damage to any material suspected to contain asbestos, such as stucco, floor tile, etc., since these buildings/structures/facilities were not previously surveyed. The 2003 survey focused on identifying damage to known or suspected ACM (since ACM that is not damaged cannot be FAD); therefore, the 2003 survey did not include sampling. Damaged ACM linoleum (FAD ACM) was found in only one Wherry housing unit (Building 8641-North). Any damaged material identified for Building 834 and the stables area that was suspected to contain ACM is assumed to be FAD ACM (friability was not verified). DON will analyze samples for FAD ACM prior to any transfer of such property to homeless assistance providers.



The following sections summarize specific notifications and restrictions regarding the presence of ACM in some of the buildings/structures/facilities situated within the parcels proposed for transfer.

### **Notifications**

Available information on the existence, extent, and condition of ACM at buildings/structures/facilities within the parcels proposed for transfer is provided in Table 14 and 15. This information was collected from six ACM surveys conducted at the former MCAS El Toro. ACM surveys were conducted at former MCAS El Toro in 1989 by IT Corporation, 1991 by Ecology and Environmental, Inc., 1995 and 1996 by PWC, 1999 by CABACO/Tait, 2000 and 2001 by Brown and Caldwell, and 2003 by Earth Tech (USMC/SWDIV 2003; Earth Tech 2003). The 2000 and 2001 surveys were limited to FAD ACM. The ACM survey conducted in 2003 examined Wherry Housing units for damaged ACM and documented the location and quantity of damaged material identified. Results of the 2003 survey are provided in Table 15. Copies of the ACM survey reports will be included in the transfer documentation.

In connection with its use and occupancy of the property, including, but not limited to, (1) removal of ACM discovered during demolition or renovation of buildings/structures/facilities and (2) demolition of any buildings/structures/facilities containing or presumed to contain asbestos or ACM, the transferee shall manage asbestos and/or ACM in accordance with all applicable federal, state, and local laws and other requirements relating to asbestos and ACM.

### **Restrictions**

The prospective transferee(s) will be required to comply with the specific restrictions listed below. The buildings/structures/facilities within the parcels proposed for transfer have been separated into the following four categories based on the survey findings to assist in determining the restrictions associated with asbestos. (Buildings/structures/facilities that were not part of the historic ACM surveys, including those buildings/structures/facilities due to their physical features [such as antennas, playing fields, etc.] were reevaluated for the need for an ACM survey. These buildings/structures/facilities were categorized as either category 'b' or 'd', defined below, and are italicized. These buildings/structures/facilities have not been surveyed for ACM and therefore are not listed in Tables 14 and 15.):

- a) Buildings/structures/facilities containing FAD ACM
- b) Buildings/structures/facilities requiring an ACM survey
- c) Buildings/structures/facilities containing non-FAD ACM
- d) Buildings/structures/facilities containing no ACM

#### **(a) Buildings/Structures/Facilities Containing FAD ACM**

- Except for short-term tours and emergency maintenance, access, use, or occupancy is prohibited pending either (1) the completion of ACM surveys and completion of any necessary ACM abatement, or (2) demolition by the transferee, in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM. Pending completion of abatement or demolition, the transferee shall manage the ACM in accordance with all such applicable local, state, and federal laws and requirements.

These restrictions are applicable to the following buildings/structures/facilities:

- Parcel I-A – Buildings 57, 58, 66, 77, 94, 275, 276, 288, 328, 329, 366, 449, 450, 451, 452, 660, 661, 666, 667, 668, and 669
- Parcel II-A – Buildings 138, 405, 406, 441, 636, 834, and one Wherry housing unit (Building 8641-North)
- Parcel III-A – No buildings/structures/facilities containing FAD ACM were identified in Parcel III-A
- Parcel IV – No buildings/structures/facilities were identified in Parcel IV

**(b) Buildings/Structures/Facilities Requiring an ACM Survey**

Buildings/structures/facilities require a survey if: they have never been surveyed for ACM; non-FAD ACM was detected in a survey conducted prior to, but not since 1997 (i.e., not within the last 3 years of station operation); or they were surveyed for FAD ACM only and, therefore, the presence of non-FAD ACM is unknown.

- Except for short-term tours and emergency maintenance, access, use, or occupancy is prohibited pending either (1) completion of ACM surveys and completion of any necessary ACM abatement by the transferee or (2) demolition by the transferee, in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM. Pending completion of abatement or demolition, the transferee shall manage the ACM in accordance with all such applicable local, state, and federal laws and requirements.

This restriction is applicable to the following buildings/structures/facilities:

- Parcel I-A – Buildings 10, 15, 17, 19, 23, 49, 50, 56, 99, 147, 152, 263, 264, 272, 277, 280, 347, 382, 578, 584, 600, 601, 629, 657, 662, 687, 702, 729, 731, 732, 733, 736, 740, 741, 757, 766, 794, 844, 863, 864, 890, 896, 898, 1702, 5101, 5102, 5103, 5104, 5105, and Saddleback Terrace housing area
- Parcel II-A – Buildings 129, 137, 291, 384, 402, 404, 407, 408, 409, 414, 416, 459, 460, 462, 579, 581, 582, 602, 607, 610, 627, 628, 665, 679, 680, 686, 714, 715, 722, 727, 728, 737, 762, 784, 792, 817, 826, 828, 831, 835, 840, 841, 845, 847, 848, 854, 855, 856, 868, 869, 870, 871, 872, 881, 883, 885, 1721, 1798, 5014, NAMAR housing area, San Joaquin housing area, Vista Terrace housing area, and portions of Wherry housing area (except for the units surveyed in 2003).
- Parcel III-A – Buildings 38
- Parcel IV – No buildings/structures/facilities were identified within Parcel IV

**(c) Buildings/Structures/Facilities Containing Non-FAD ACM**

This category includes buildings/structures/facilities for which ACM surveys have been conducted since 01 January 1997 (i.e., within the last 3 years of station operations) that detected non-FAD ACM.

- The transferee shall manage ACM in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM.

The restriction is applicable to the following buildings/structures/facilities:

- Parcel I-A – Buildings 11, 12, 13, 52, 60, 83, 256, 257, 271, 285, 289, 376, 471, 624, 683, 694, 730, and 799
- Parcel II-A – Buildings 120, 121, 122, 123, 134, 135, 371, 415, 453, 454, 455, 456, 461, 463, 464, 619, portions of Wherry housing units surveyed in 2003 (except Building 8641-North which contains FAD-ACM), and the Stable Area
- Parcel III-A – Building 241 and 251
- Parcel IV – No buildings/structures/facilities were identified within Parcel IV

**(d) Buildings/Structures/Facilities Containing No ACM**

This category includes buildings/structures/facilities that have been surveyed for ACM and for which no ACM was detected or are of a construction type that does not include ACM (e.g., metal frame structure).

- There are no restrictions based on the presence of asbestos or ACM. If ACM is discovered during use, occupancy, renovation or demolition, the transferee shall be responsible for management and/or removal of ACM in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM.

This is applicable to the following buildings/structures/facilities:

- Parcel I-A – Buildings 3, 4, 8, 9, 14, 16, 20, 21, 48, 53, 54, 59, 146, 273, 279, 410, 422, 427, 430, 432, 472, 475, 523, 615, 625, 626, 656, 681, 684, 685, 703, 704, 707, 739, 744, 773, 774, 775, 776, 777, 793, 797, 823, 829, 833, 839, 842, 852, 873, 874, 876, 894, 899, 929, 941, 944, 955, 956, 957, 958, 959, 960, 969, 970, 971, and 1815
- Parcel II-A – Buildings 132, 136, 142, 163, 164, 165, 166, 167, 169, 170, 171, 172, 290, 293, 341, 389, 391, 440, 458, 469, 611, 614, 638, 645, 664, 676, 678, 708, 711, 713, 755, 756, 782, 785, 786, 790, 816, 849, 882, 884, 895, 901, 916, 917, 922, 927, 931, 934, 935, 951, 953, 954, 961, 964, 1538, 1650, 1774, 1787, 1791, and portions of Wherry housing units
- Parcel III-A – Buildings 27, 421, 519, 520, and 942
- Parcel IV – No buildings/structures/facilities were identified within Parcel IV

## **5.12 LEAD-BASED PAINT**

The following sections summarize the history of DON's management of LBP on the parcels proposed for transfer, as well as specific notifications and restrictions regarding the presence of LBP in some of the buildings/structures/facilities situated within the parcels proposed for transfer.

### **Residential Buildings/Structures/Facilities**

DON policy for residential buildings/structures/facilities is contained in the joint EPA/DoD interim final *Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property - A Field Guide* (DOD/EPA 1999). The policy applies specifically to "target housing," which is housing constructed before 1978 (including child-occupied buildings/structures/facilities such as day care centers), except for homes designated for elderly or disabled persons and/or dwellings in which living areas are not separated from the sleeping area (e.g., barracks). The policy further requires that federally owned residential real property scheduled for transfer be subject to:

- Inspection, risk assessment, and abatement of LBP hazards (LBP, soil, and dust) in target housing constructed prior to 1960.
- Inspections and risk assessment for target housing constructed between 1960 and 1978.

Additional requirements in the U.S. EPA/DoD policy related to LBP include:

- Soil lead hazards surrounding target housing constructed between 1960 and 1978 will be abated by DON or will be abated by the transferee as part of the transfer agreement.
- For child-occupied buildings/structures/facilities (i.e., day care centers, preschools) on residential real property that will be reused as child occupied buildings/structures/facilities after transfer, DON will evaluate for LBP hazards, and require any hazards identified to be abated by the transferee prior to reuse.
- The soil adjacent to target housing scheduled for demolition and planned for redevelopment after transfer will be evaluated for soil-lead hazards by the transferee after demolition of the existing target residential buildings/structures/facilities. The transferee will conduct abatement of soil-lead hazards identified in the evaluation prior to occupancy of the new residential buildings/structures/facilities.

Prior to transferring the property, DON is required to document survey results by disclosing known LBP and/or LBP hazards in the Basewide EBS and referencing the evaluation results in the FOST and transfer agreement or transfer documents for residential buildings/structures/facilities.

Abatement of LBP was conducted in 1997 for the housing units within the Wherry and Saddleback Terrace/Vista housing areas. Abatement mainly consisted of encapsulating wood members containing LBP with vinyl siding to prevent any exposure to LBP. This abatement was done in accordance with Occupational Safety and Health Administration (OSHA) safety standards (USMC/SWDIV 1999). Target housing buildings/structures/facilities (where LBP has previously been identified) for which DON does not update LBP evaluations within the 12-month period preceding transfer have been designated as requiring demolition after transfer in accordance with all applicable federal, state, and local LBP laws and regulations as a condition of transfer. However, a potential exception is a portion of Wherry housing area containing 168 housing units designated for potential residential use (units are the same as are found in Table 15). A risk assessment was conducted in June 2003 for this area to identify LBP hazards in anticipation of this potential future use. The assessment identified LBP hazards on concrete foundations and in vents, garages, and interior dust (CDM 2003). However, if the Wherry housing area units are to be used after transfer, any necessary abatement will be conducted prior to any such use. If the Wherry housing area units are not transferred for use, DON will require demolition of these units along with other target housing (except San Joaquin housing) in accordance with all applicable federal, state, and local LBP laws and regulations. Any necessary abatement must be conducted no later than 12 months after completion of the risk assessment and all known LBP hazards must be disclosed to the transferee at the time of transfer (DoD/EPA 1999).

#### **Nonresidential Buildings/Structures/Facilities**

In order to address the risk of adverse health effects to children from LBP exposure, legislation and national policy regarding LBP has focused on residential areas and child-occupied buildings/structures/facilities where children may be present. Non-residential buildings/structures/facilities (e.g., warehouses and office buildings) are typically occupied by adults, with minimal exposure to children. Nonresidential buildings/structures/facilities constructed

prior to 1978 may not be used for residential use or child-occupied buildings/structures/facilities unless the transferee performs any necessary evaluation(s) and abatement in accordance with all federal, state, and local laws and other applicable requirements. DON will not conduct LBP evaluations at non-residential buildings/structures/facilities prior to transfer.

Information pertaining to LBP at non-residential buildings/structures/facilities, if any, will be provided to the transferee with the transfer documents. Notification of potential LBP at non-residential buildings/structures/facilities where surveys were not conducted will be based on the age of construction (i.e., constructed before 1978).

Demolition of non-target housing buildings/structures/facilities containing or presumed to contain LBP must be performed in accordance with applicable local, state, and federal requirements.

## **Notifications**

### **Residential Buildings/Structures/Facilities**

The Navy PWC completed an LBP survey in family housing and related buildings/structures/facilities at MCAS El Toro in 1994. Four housing areas at MCAS El Toro (NAMAR, San Joaquin, Wherry, and Saddleback Terrace/Vista Terrace) were surveyed for LBP (PWC 1995a-d, 1996). The results of the surveys indicated that LBP was identified at high levels (Hazard Risk Assessment levels are identified as high, medium, and low) in two of these housing communities. Housing areas where LBP at high levels was identified include Wherry (built in 1954) and Saddleback Terrace/Vista Terrace (built in 1947). Under current DoD LBP guidance, these two housing areas required LBP abatement. Lead concentrations in all soil and dust samples were either not detected or were below threshold limits.

An evaluation of the potential LBP hazards in soil for housing areas at former MCAS El Toro was conducted in 2002 (DON 2002d). The evaluation included sampling for LBP at all former housing areas since all housing areas were constructed prior to 1978 when use of LBP was phased-out. The intent of the sampling was to determine whether further evaluation of LBP in soil was necessary at the former housing areas prior to transferring the property for reuse. The seven housing areas included in the evaluation were: Saddleback Terrace senior officers quarters, Saddleback Terrace, Saddleback Terrace II senior officers quarters, Vista Terrace, NAMAR, Wherry, and San Joaquin. Results of the housing area surveys indicated that lead concentrations in all of the composite soil samples and yard-wide averages for all housing units were below the regulatory criteria for U.S. EPA and DTSC. Based on current regulations and guidance and the results of the survey/evaluation, no further evaluation is warranted for lead in soil prior to transfer of the housing areas.

### **Nonresidential Buildings/Structures/Facilities**

Notifications of potential LBP at buildings/structures/facilities within the parcels proposed for transfer are based on the age of construction (i.e., constructed before the Consumer Product Safety Commission's 1978 ban on LBP for residential use). The parcels proposed for transfer contains buildings/structures/facilities that were built prior to 1978 and may contain LBP. The age of many of the structures on the property suitable for transfer suggests the likelihood that lead-based paint may be present on some of these structures. This in turn creates the possibility that, through the action of normal weathering and maintenance, there may be lead from lead-based paint in the soil surrounding these structures. Table 1 provides a list of all non-demolished buildings/structures/facilities within the parcels proposed for transfer and their corresponding dates of construction.

Demolition of non-residential buildings/structures/facilities built prior to 1978 creates the possibility of lead being found in the soil as a result of such activities. With respect to any such non-residential buildings/structures/facilities which the transferee intends to demolish and redevelop for residential use after transfer, the transferee may, under applicable law or regulation, be required by DTSC or other regulatory agencies to evaluate the soil adjacent to such non-residential buildings/structures/facilities for soil-lead hazards, and to abate any such hazards that may be present, after demolition of such non-residential buildings/structures/facilities and prior to occupancy of any newly constructed residential structures.

### **Restrictions**

The prospective transferee will be required to comply with the specific restrictions listed below. The buildings/structures/facilities within the parcels proposed for transfer have been separated into two categories to assist in determining the restrictions associated with LBP: a) buildings/structures/facilities built prior to 1978, or that have an unknown construction date, and b) buildings/structures/facilities built after 1978. Building/structure/facility construction dates are provided in Table 1.

#### **(a) Buildings/Structures/Facilities Built Prior to 1 January 1978, or Construction Date is Unknown**

##### **Residential Buildings/Structures/Facilities**

- The transferee will be required to demolish the target housing buildings/structures/facilities except for the San Joaquin housing units and 168 of the Wherry housing units (units are the same as are found in Table 15) in accordance with federal, state, and local laws, and applicable requirements. Soil adjacent to the target housing scheduled for demolition and planned for redevelopment after transfer will be evaluated for soil-lead hazards by the transferee after demolition of the existing target residential buildings/structures/facilities. The transferee will conduct abatement of soil-lead hazards identified in the evaluation prior to occupancy of the new residential buildings/structures/facilities.

These restrictions apply to all the housing units in the NAMAR, Saddleback, and Saddleback Terrace/Vista Terrace housing areas, and to the housing units in the Wherry housing area that have not been designated for potential residential use.

Note: There are no restrictions for San Joaquin Housing units based on LBP, since a 1995 survey found no LBP on either interior or exterior surfaces of such units. Additionally, if the Wherry Housing units for which updated LBP evaluations that have been conducted by DON (see above discussion) are not transferred for residential use, the Invitation for Bid (IFB) will indicate, based upon such updated evaluations, either that (1) such units will be transferred without restriction, (2) occupancy of such units will be restricted pending performance of any required abatement of LBP hazards by the transferee, or (3) the transferee will be required to demolish such units.

##### **Nonresidential Buildings/Structures/Facilities**

Nonresidential buildings/structures/facilities constructed prior to 1978 may not be used for residential use or child-occupied buildings/structures/facilities unless the transferee performs any necessary evaluation(s) and abatement in accordance with all federal, state, and local laws and other applicable requirements.

**(b) Buildings/Structures/Facilities Built After 1 January 1978**

In its use and occupancy of the property, including but not limited to demolition of buildings/structures/facilities and identification and/or evaluation of any LBP hazards, the transferee shall be responsible for managing LBP and LBP hazards in accordance with applicable local, state, and federal laws and other requirements relating to LBP and LBP hazards.

**5.13 RADON****Notifications**

Radon is a naturally occurring, colorless, and odorless radioactive gas that is produced by radioactive decay of naturally occurring uranium. Uranium decays to radium, of which radon gas is a by-product. Radon is found in high concentration in rocks containing uranium such as granite, shale, phosphate, and pitchblende. Atmospheric radon is diluted to insignificant concentrations. Radon that is present in the soil, however, can enter a building/structure/facility through small spaces and openings, accumulating in enclosed areas such as basements. The cancer risk caused by exposure through the inhalation of radon is a topic of concern.

DoD policy is to disclose available and relevant radon assessment data pertaining to BRAC property being leased or transferred for inclusion in property lease/transfer documents. However, there is currently no federal requirement to perform follow-on radon assessment or mitigation in federal buildings, including those to be transferred to the public or private sector.

A radon survey was conducted at former MCAS El Toro in 1991. In accordance with DoD guidance (DoD 1994a), radon screening results were based upon a representative sampling of buildings/structures/facilities. The buildings/structures/facilities surveyed included the station hospital (Building 431), the childcare center (Building 656), and approximately 185 locations in the family housing areas. The results indicated that none of the buildings/structures/facilities or housing units exceeded the radon threshold value of 4 picocuries per liter (pCi/l). Therefore, no mitigative action or further testing was recommended (JEG 1995a). Based on these sampling results, it is anticipated that radon levels in other buildings/structures/facilities at former MCAS El Toro should not be significantly different from those surveyed (levels should not exceed 4 pCi/l) (USMC/SWDIV 1999).

**Restrictions**

There are no restrictions due to radon.

## 6. SUMMARY OF RESTRICTIONS

The prospective transferee will be required to comply with the specific restrictions listed in Section 5 of this FOST. Table 16a provides a summary of the notifications and restrictions for each transfer parcel as a whole and a cross-reference to the section in this document. Table 16b provides a cross reference to the section in this document where the notifications and restrictions applicable to each building/structure/facility included in this FOST can be found (demolished buildings/structures/facilities are also listed and identified).



## **7. RIGHT OF ACCESS AND COVENANTS**

The deed shall reserve and the transferee shall grant to the U.S. an appropriate right of access to the FOST parcels, pursuant to CERCLA Section 120(h), to enable the U.S. and environmental regulators to enter said parcels in any case in which remedial action or corrective action is found to be necessary on said parcels or adjacent property after the date of property transfer.

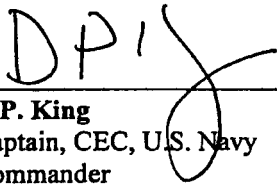
The deed for transfer of any property on which “any hazardous substance was stored for one year or more, [or] known to have been released, or disposed of...” as a result of former activities conducted by the U.S., will include a covenant made pursuant to CERCLA Section 120(h)(3)(A)(ii). The covenant will warrant “that all remedial action necessary to protect human health and the environment with respect to any such substances remaining on the property has been taken before the date of such transfer” and “that any additional remedial action found to be necessary after the date of such transfer shall be conducted by the U.S.” This covenant will not apply to any remedial action required on the property that is a result of an act or omission of the transferee that causes a new release of hazardous substances.

The deed for transfer of any property on which there has been no release or disposal of hazardous substances or petroleum products or petroleum derivatives, and for which required regulatory concurrence as to such status has been obtained, will include a covenant made pursuant to CERCLA Section 120(h)(4)(D). Such covenant will warrant that any response action or corrective action found to be necessary after the date of transfer shall be conducted by the U.S. This covenant shall not apply to any response action or corrective action required on the property that is a result of an act or omission of the transferee.

**8. CONCLUSIONS/FINDING OF SUITABILITY TO TRANSFER**

Pursuant to CERCLA Section 120(h)(3)(A)(i) and the provisions of 40 Code of Federal Regulations Part 373, the deed will contain a notice of hazardous substances stored, released, or disposed within the applicable transfer parcels at former MCAS El Toro. A release or disposal of hazardous substances or petroleum products has occurred within the transfer boundaries of Transfer Parcels I-A, II-A, and III-A included in this FOST. The Hazardous Substances and Petroleum Products Notification Tables are provided in Attachment 2. The Petroleum Products Notification Table lists the sites containing petroleum products which are within the scope of the CERCLA Petroleum Exclusion set forth in CERCLA Section 101(14).

On the basis of the foregoing information and analysis, I have concluded that any necessary remedial and corrective action has been taken and that the requirements of CERCLA Section 120(h) have been met at Transfer Parcels I-A, II-A, III-A, and IV. I find that those parcels are suitable for transfer by deed for residential purposes, subject to the notifications and restrictions set forth in Section 5.0. The parcels proposed for transfer can be used with acceptable risk to human health and the environment and without interference with the environmental restoration process.

Date: 3 AUG 2004Signature:   
D.P. King  
Captain, CEC, U.S. Navy  
Commander

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Table 1: Buildings/Structures/Facilities Within Parcels Proposed for Transfer

Parcel	Building/Structure/Facility Number	Building/Structure/Facility Name/Description	Year of Construction	Square Feet
<b>Stationwide</b>				
I / II / III	N/A	Active Sanitary Sewer Lines	<1943	Unknown
I / II / III	N/A	Irrigation Pipeline	<1952	Unknown
<b>Parcel I-A</b>				
I-A	N/A	Saddleback Terrace (includes 69 units)	1943-1964	385,429
I-A	3	Storage	1943	1,560
I-A	4	Search and Rescue Office	1943	1,560
I-A	8	Storage	1943	1,560
I-A	9	Storage	1942	1,560
I-A	10	Aero Club Hanger	<1948	Unknown
I-A	11	Squadron Headquarters	1943	3,960
I-A	12	Group Headquarters	1943	3,960
I-A	13	Group Headquarters	1943	3,960
I-A	14	Squadron Headquarters	1943	3,960
I-A	15	Radio Supply and Communications Shop	1943	6,240
I-A	16	Storage	1943	6,240
I-A	17	Electrical and Communications Maintenance Shop	1943	6,240
I-A	19	Squadron Headquarters	1943	6,240
I-A	20	Maintenance and Storage	1943	6,240
I-A	21	General Storage Shed	1943	640
I-A	23	Storage	1943	6,240
I-A	48	Headquarters	1943	5,148
I-A	49	Vacant (former Squadron Headquarters/Academic Instruction/and Storage)	1943	22,066
I-A	50	Warehouse	1943	6,240
I-A	52	Storage	1943	4,224
I-A	53	Ground Safety	1943	4,036
I-A	54	Law Center	1943	11,374
I-A	56	Ground Safety/Squadron Headquarters	1943	11,528
I-A	57	Bath House	1943	9,310
I-A	58	Family Housing Service Office/Billeting	1943	30,610
I-A	59	Administration Office	1943	5,696
I-A	60	Reserve Support Unit	1943	5,376
I-A	66	Disbursing Office	<1948	Unknown
I-A	77	Administration Office/Exchange Maintenance Shop and Vacant Warehouse	1943	18,951
I-A	83	Red Cross/Navy Relief Religious Ministry Facilities	1943	12,180
I-A	94	Gym	1943	23,123
I-A	99	Flightline Storage	1943	79

Table 1: Buildings/Structures/Facilities Within Parcels Proposed for Transfer

Parcel	Building/Structure/Facility Number	Building/Structure/Facility Name/Description	Year of Construction	Square Feet
I-A	146	Standby Generator Building	1943	360
I-A	147	Post Office Box Structure	<1948	Unk.
I-A	152	Grounds Equipment Shed	1943	112
I-A	256	Medical Clinic/Aviation Physical Training Unit	1945	17,355
I-A	257	Administration Office	1944	4,596
I-A	263	Education Service Office	1945	8,976
I-A	264	MWR Rental Office/Arts and Crafts Hobby Shop	1945	12,404
I-A	271	Auditorium	1944	26,733
I-A	272	Bowling Center	1944	14,664
I-A	273	Post Office	1944	5,104
I-A	275	Band Training	1944	12,960
I-A	276	Vacant Storage	1945	12,960
I-A	277	Vacant Barracks	1945	12,960
I-A	279	Family Service/Drugs and Alcohol program/ Rehab Center	1945	12,960
I-A	280	Library	1945	6,480
I-A	285	Club System Warehouse/Supply Warehouse	1944	16,000
I-A	288	Search and Rescue Office and Maintenance Hangar	1944	7,200
I-A	289	Aircraft Operations and Maintenance Hanger	1944	10,370
I-A	328	Temporary Administration Spaces	1945	43,923
I-A	329	Headquarters Building	1945	22,328
I-A	347	Exchange Food Service Warehouse	1948	9,306
I-A	366	Bachelor Enlisted Quarters	1954	44,016
I-A	376	Fire Station Dispatch	1954	1,649
I-A	382	Electrical Distribution Substation #1	<1958	207
I-A	410	Playing Fields (Softball)	<1958	N/A
I-A	422	Tennis Playing Courts	<1958	N/A
I-A	427	Handball Courts/Basketball	<1958	N/A
I-A	430	Tennis Playing Courts	<1958	N/A
I-A	432	Football/Soccer/Baseball Fields	<1958	N/A
I-A	449	Bachelor Enlisted Quarters	1959	29,109
I-A	450	Bachelor Enlisted Quarters	1959	29,109
I-A	451	Bachelor Enlisted Quarters	1959	29,109
I-A	452	Bachelor Enlisted Quarters	1959	29,109
I-A	471	Station Training Pool	<1973	N/A
I-A	472	Wading Pool	<1973	N/A
I-A	475	Storage Building Disbursing	1946	192
I-A	523	Storage	1945	192

Table 1: Buildings/Structures/Facilities Within Parcels Proposed for Transfer

Parcel	Building/Structure/Facility Number	Building/Structure/Facility Name/Description	Year of Construction	Square Feet
I-A	578	Public Toilet/Water Distribution Building	1957	300
I-A	584	Low Frequency Homer Building	1958	140
I-A	600	Storage	1961	4,108
I-A	601	Public Toilet / Picnic Area #1	1962	92
I-A	615	Handball Courts	1966	1,743
I-A	624	Air Terminal/Squadron Headquarters	1967	11,470
I-A	625	Hobby Shop, Automotive	1967	6,153
I-A	626	Hobby Shop, Automotive	1967	480
I-A	629	Academic Instruction Building	1968	4,260
I-A	656	Child Development Center	1971	12,733
I-A	657	Visitor/Vehicle Registration	1970	315
I-A	660	Bachelor Enlisted Quarters	1973	51,347
I-A	661	Transient Enlisted Quarters	1973	51,347
I-A	662	Heating Plant Building	1973	546
I-A	666	Bachelor Enlisted Quarters	1973	33,984
I-A	667	Bachelor Enlisted Quarters	1973	33,984
I-A	668	Bachelor Enlisted Quarters	1973	33,984
I-A	669	National Guard/Vacant Bachelor Enlisted Quarters	1973	22,408
I-A	681	Recreation Grounds (Area #2)	<1973	Unknown
I-A	683	Vacant Cold Storage Warehouse/General Warehouse	1974	15,138
I-A	684	Vacant Applied Instruction Building	1974	804
I-A	685	Electrical Distribution Building	1974	200
I-A	687	Public toilet/ Picnic Area #2	1974	176
I-A	694	Commissary	1975	47,120
I-A	702	Gate Sentry House #2	1977	81
I-A	703	Tennis Playing Courts	<1997	Unknown
I-A	704	Basketball/Volleyball Courts	<1997	Unknown
I-A	707	Sign Station Activities	<1997	Unknown
I-A	729	Main Gate Sentry House	1979	48
I-A	730	Communications Center	1980	6,500
I-A	731	Bachelor Enlisted Quarters	1980	41,157
I-A	732	Bachelor Enlisted Quarters	1980	41,157
I-A	733	Bachelor Enlisted Quarters Boiler Room	1980	1,689
I-A	736	Racquetball Facility	1982	3,400
I-A	739	Bachelor Enlisted Quarters	1982	13,350
I-A	740	Bachelor Enlisted Quarters	1982	40,996
I-A	741	Bachelor Enlisted Quarters	1982	45,435



Table 1: Buildings/Structures/Facilities Within Parcels Proposed for Transfer

Parcel	Building/Structure/Facility Number	Building/Structure/Facility Name/Description	Year of Construction	Square Feet
I-A	744	Armory/ Small Arms Shop	1983	10,084
I-A	757	Telephone Office	1983	1,716
I-A	766	Vehicle Washrack Utility Building	1984	228
I-A	773	Antenna	1983	Unknown
I-A	774	Antenna	1983	Unknown
I-A	775	Antenna	1983	Unknown
I-A	776	Antenna	1983	Unknown
I-A	777	Antenna	1983	Unknown
I-A	793	McDonalds	1985	3,754
I-A	794	EOD Team Building	1985	3,600
I-A	797	AVGAS Fueling Station	<1997	Unknown
I-A	799	Package Store	1986	10,000
I-A	823	Temporary Lodging Facility	1986	23,800
I-A	829	Wing Headquarters/Administration Office	1988	45,907
I-A	833	Chapel	1988	7,228
I-A	839	Combat Training Pool	1987	20,820
I-A	842	Bachelor Enlisted Quarters	1989	271,550
I-A	844	Communications/Electrical Facility	1988	10,176
I-A	852	Bachelor Enlisted Quarters Boiler Building	1989	2,576
I-A	863	Sentry House #1	1988	75
I-A	864	Sentry House #2	1988	75
I-A	873	Child Development Center	1991	23,375
I-A	874	Obstacle Course	<1997	Unknown
I-A	876	Zoonois Central Clinic	1990	600
I-A	890	Classified Material Destruction Building	1990	126
I-A	894	Recreation Pavilion	1975	1,529
I-A	896	Exchange Car Wash Building	1992	324
I-A	898	Kennel	1992	960
I-A	899	Base Realignment and Closure/Data Processing Center	1993	22,107
I-A	929	Kennel Run	1987	540
I-A	941	Hazardous Waste Storehouse	<1997	39
I-A	944	Hazardous Materials Storehouse	<1997	253
I-A	955	Hazardous Material Storehouse	<1997	1,352
I-A	956	Hazardous Waste Storehouse	<1997	720
I-A	957	Hazardous Waste Storehouse	<1997	320
I-A	958	Hazardous Waste Storehouse	<1997	200
I-A	959	Hazardous Waste Storehouse	<1997	513

Table 1: Buildings/Structures/Facilities Within Parcels Proposed for Transfer

Parcel	Building/Structure/Facility Number	Building/Structure/Facility Name/Description	Year of Construction	Square Feet
I-A	960	Hazardous Waste Storehouse	<1997	200
I-A	969	Hazardous Waste Storehouse	<1997	Unknown
I-A	970	Hazardous Waste Storehouse	<1997	200
I-A	971	Hazardous Waste Storehouse	<1997	93
I-A	1702	Self Service Car Wash	1955	1,980
I-A	1815	Dog Kennel	1979	100
I-A	5101	Commanding General Quarters	1943	2,819
I-A	5102	Commanding General Quarters	1943	2,969
I-A	5103	Married Officers Quarters	1947	1,479
I-A	5104	Married Officers Quarters	1947	1,479
I-A	5105	Married Officers Quarters	1947	1,479
<b>Parcel II-A</b>				
II-A	N/A	Wherry Housing (includes 553 units)	1954	540,713
II-A	N/A	San Joaquin Housing (includes 300 units)	1973	369,375
II-A	N/A	Vista Terrace Housing (includes 50 units)	1947	108,702
II-A	120	Maintenance Hangar	1943	6,240
II-A	121	Fire Station #3/Maintenance Hangar	1943	6,240
II-A	122	Maintenance Hangar	1943	6,240
II-A	123	Maintenance Hangar	1943	6,240
II-A	129	Aviation Armament	1943	3,900
II-A	132	Aviation Armament Shop	1943	6,240
II-A	134	Hangar Maintenance Administration	1943	6,240
II-A	135	Vacant Enlisted Men's Messhall	1943	6,240
II-A	136	NBC Storage	1943	6,240
II-A	137	Academic Instruction/Storage	1943	6,240
II-A	138	Electronic Maintenance Division	1943	6,240
II-A	142	Hazardous Material /Flammable Material Storage	1943	640
II-A	163	Vacant Inert Storehouse	1943	1,250
II-A	164	Vacant Inert Storehouse	1943	1,250
II-A	165	Hazardous Material/Flammable Material Storage/Aviation Support	1943	1,250
II-A	166	Vacant Inert Storehouse	1943	1,250
II-A	167	Vacant Inert Storehouse	1943	1,250
II-A	169	NBC Storage	1943	140
II-A	170	Vacant Inert Storehouse	1943	1,250
II-A	171	Vacant Inert Storehouse	1943	140
II-A	172	Vacant Inert Storehouse	1943	1,250
II-A	290	General Storage Shed	1944	4,000
II-A	291	NBC Storage	1944	14,400
II-A	292	Applied Instruction/Vacant Office	1944	13,126
II-A	293	Storage Tank/Potable Water	<1948	N/A

Table 1: Buildings/Structures/Facilities Within Parcels Proposed for Transfer

Parcel	Building/Structure/Facility Number	Building/Structure/Facility Name/Description	Year of Construction	Square Feet
II-A	341	Ground Support Equipment Shop	1945	468
II-A	371	Maintenance Hanger and Engine Maintenance Shop	1954	86,652
II-A	384	Electrical Distribution Substation #3	1954	160
II-A	389	Loading/Unloading Ramp	<1958	159
II-A	391	Loading/Unloading Ramp	<1958	159
II-A	402	Stables Toilet	1957	75
II-A	404	Receiver Building	1957	909
II-A	405	Applied Instruction Building	1983	3,208
II-A	406	Applied Instruction Building	1956	2,285
II-A	407	Vacant Squadron Headquarters	1956	400
II-A	408	Vacant Guard Tower	1956	64
II-A	409	Vacant Guard Tower	1956	64
II-A	414	Standby Generator Building	Unk.	Unk.
II-A	415	Storage	1957	40,313
II-A	416	Storage	1957	480
II-A	440	Missile Magazine	1959	930
II-A	441	Aviation Armaments	1959	1,500
II-A	453	Maintenance Hangar	1960	5,040
II-A	454	Maintenance Hangar	1960	5,040
II-A	455	Operational Trainer Facility	1960	9,050
II-A	456	Aviation Supply Office/Organic Storage	1960	70,163
II-A	458	Hazardous and Flammable Materials Storehouse	1960	2,000
II-A	459	Storage Tank Nonpotable	<1973	N/A
II-A	460	Water Supply Building Nonpotable	1959	438
II-A	461	Maintenance Hanger	1960	35,362
II-A	462	Maintenance Hanger	1960	36,136
II-A	463	Engine Maintenance Shop/Maintenance Hanger	1960	15,519
II-A	464	Golf Club Clubhouse	1959	8,748
II-A	469	Equipment Storage Shed	1959	69
II-A	579	General Storage Shed	1957	176
II-A	581	Chaplain Annex/Navy Relief Thrift Shop	1945	4,460
II-A	582	Maintenance Building/ Housing	1954	2,500
II-A	602	Van Maintenance Shop	1964	4,800
II-A	607	Public Toilet/Golf Course	1965	92
II-A	610	Water Distribution Building	1966	1,126
II-A	611	Missile Magazine	1966	930
II-A	614	Agua Chinon Playground	<1973	Unknown
II-A	619	Standby Generator Building	1966	1,329
II-A	627	Air Surveillance Radar Building	<1973	1,096
II-A	628	Air Surveillance Radar Tower	<1973	576
II-A	636	Cryogenics Office/Parachute-Survival Equipment Shop	1969	9,030
II-A	638	Wind Direction Indicator	<1973	N/A

Table 1: Buildings/Structures/Facilities Within Parcels Proposed for Transfer

Parcel	Building/Structure/Facility Number	Building/Structure/Facility Name/Description	Year of Construction	Square Feet
II-A	645	Arresting Gear	<1973	N/A
II-A	664	Substation building	1972	625
II-A	665	Fire Hose Drying Structure	<1973	169
II-A	676	Community Storage Misc.	1973	1,750
II-A	678	Housing Maintenance Storage	1973	1,750
II-A	679	Stable/Stallion Pen	1973	1,100
II-A	680	Stable Feed Room	1973	400
II-A	686	Riding Stable, Tack Locker	1974	2,500
II-A	708	Sign Station Activities	<1997	N/A
II-A	711	Vacant Power Check Pad without Sound Dampening	<1997	Unknown
II-A	713	Hazardous and Flammable Materials Storehouse	1977	3,600
II-A	714	Line Maintenance Shelter	1977	1,000
II-A	715	Line Maintenance Shelter	1977	1,000
II-A	722	Vacant Convenience Food Store	1980	12,000
II-A	727	Line Maintenance Shelter	1981	1,000
II-A	728	Aircraft Line Operations Building	1983	1,000
II-A	737	Vacant	1981	1,000
II-A	755	LOX Shelter	1983	150
II-A	756	LOX Shelter	1983	150
II-A	762	Vehicle Washrack Utility Building	1984	228
II-A	782	Golf Course Maintenance Building	1983	1,320
II-A	784	DRMO Field Office Lot #2	1984	400
II-A	785	Aviation Maintenance Building	1984	5,600
II-A	786	Aviation Armament	1984	3,000
II-A	790	Golf Cart Building	1985	3,471
II-A	792	Stables Barn	1984	2,880
II-A	816	Computer Van Pad	<1997	174
II-A	817	Vehicle Wash Building	1985	288
II-A	826	Armory	1986	4,050
II-A	828	Stables Equipment Building	<1997	1,120
II-A	831	Cryogenics	1987	5,074
II-A	834	Family Housing Community Center	1988	5,000
II-A	835	Gate #3 Sentry House	1987	96
II-A	840	Explosive Safety Office	1987	928
II-A	841	Open Ammunition Storage	<1997	630
II-A	845	Washrack Utility Building	1988	832
II-A	847	Pumphouse	1988	925
II-A	848	Utility Building	683	1998
II-A	849	Water Storage Tank	<1997	N/A
II-A	854	Electronics Communications Maintenance/Paint Spray Booth	1988	1,948
II-A	855	Electrical Distribution Building	<1997	Unknown
II-A	856	General Storage Shed/ Public Toilet/ Sentry Building	1988	3,590

Table 1: Buildings/Structures/Facilities Within Parcels Proposed for Transfer

Parcel	Building/Structure/Facility Number	Building/Structure/Facility Name/Description	Year of Construction	Square Feet
II-A	868	Sentry House #6	1988	75
II-A	869	Sentry House #7	1988	75
II-A	870	Sentry House #8	1988	75
II-A	871	Sentry House #9	1988	75
II-A	872	Sentry House #10	1988	75
II-A	881	Horse Stables	1989	7,700
II-A	882	Rental Office (Stables)	1989	1,152
II-A	883	Tractor Shed (Stables)	1989	965
II-A	884	Bunk House (Stables)	1989	759
II-A	885	Sun Shade at Station Stables	1987	585
II-A	895	Operations Trainer Facility	1992	5,000
II-A	901	Hazardous and Flammable Materials Storehouse	1993	8,800
II-A	916	Hazardous and Flammable Materials Storehouse	1993	150
II-A	917	Hazardous and Flammable Materials Storehouse	1993	150
II-A	922	Recreational Shelter	1980	170
II-A	927	DRMO Office Disposal Yard #2	1993	64
II-A	931	Hazardous Waste Storehouse	<1997	108
II-A	934	Hazardous Waste Storehouse	<1997	272
II-A	935	Hazardous Waste Storehouse	<1997	48
II-A	951	Hazardous Waste Storehouse	<1997	272
II-A	953	Hazardous Materials Storehouse	<1997	140
II-A	954	Hazardous Waste Storehouse	<1997	104
II-A	961	Hazardous Waste Storehouse	<1997	33
II-A	964	Hazardous Materials Storehouse	<1997	140
II-A	1538	Vacant Fuel Farm #4 Office	1945	64
II-A	1650	Aviation Armament	1947	1,680
II-A	1721	Vacant Student Instructor Lounge	1946	960
II-A	1774	Rodeo Arena	<1997	N/A
II-A	1787	Storage	1958	836
II-A	1791	Aviation Armament	1946	1,680
II-A	1798	Riding Stables/Pen Shelter	1963	2,700
II-A	5014	Family Housing	Unknown	Unknown
II-A	5201 to 5209, 5213 to 5219, 5224 to 5236, 5239, 5241, and 5242	NAMAR Housing (includes 32 units)	1945	110,674
<b>Parcel III-A</b>				
III-A	27	Food Services Storage	1943	6,240
III-A	38	Museum Storage/Young Marines	1943	9,390
III-A	241	Food Service Warehouse, Vacant Storage	1945	14,400
III-A	251	Bath house/ Conference Center/ Recreation Pavilion	1944	4,299
III-A	421	Tennis Playing Courts	<1958	N/A

**Table 1: Buildings/Structures/Facilities Within Parcels Proposed for Transfer**

Parcel	Building/Structure/Facility Number	Building/Structure/Facility Name/Description	Year of Construction	Square Feet
III-A	519	Station Training Pool	<1973	N/A
III-A	520	Wading Pool	<1973	N/A
III-A	942	Hazardous Waste Storehouse	<1997	39

Source: Earth Tech 2003

Note: Buildings/structures/facilities that have been demolished or removed are not shown.

< = before  
AVGAS = aviation gasoline  
DRMO = Defense Reutilization and Marketing Office  
EOD = explosive ordnance disposal  
LOX = liquid oxygen  
Misc. = miscellaneous  
MWR = morale, welfare, and recreation  
N/A = not applicable  
NAMAR = Navy-Marine  
NBC = nuclear, biological, and chemical

Table 2: Department of Defense Environmental Condition of Property Area Types<sup>a</sup>

Area Type	Description
1	Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas)
2	Areas where only release or disposal of petroleum products has occurred
3	Areas where release, disposal, and/or migration of hazardous substances have occurred, but at concentrations that do not require a removal or remedial action
4	Areas where release, disposal, and/or migration of hazardous substances have occurred, and all remedial actions necessary to protect human health and the environment have been taken
5	Areas where release, disposal, and/or migration of hazardous substances have occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken
6	Areas where release, disposal, and/or migration of hazardous substances have occurred, but required response actions have not yet been implemented
7	Areas that have not been evaluated or require additional evaluation

Note: <sup>a</sup> According to the Base Realignment and Closure Cleanup Plan Guidebook, properties classified as Area Types 1 through 4 may be considered suitable for transfer, and properties classified as Area Types 5 through 7 are considered unsuitable for transfer.

Source: DoD 1996

Category 2 has been divided by the Navy into five subcategories to further define petroleum product releases. Subcategories 2a through 2e correspond to Categories 3 through 7, except the Category 2 definitions refer to petroleum products rather than hazardous substances. Category 2 definitions are as follows:

- **Category 2a.** Facilities where release, disposal, and/or migration of petroleum products have occurred, but at concentrations that do not require a response action
- **Category 2b.** Facilities where release, disposal, and/or migration of petroleum products have occurred, and all response actions to protect human health and the environment have been taken
- **Category 2c.** Facilities where release, disposal, and/or migration of petroleum products have occurred, and response actions are underway, but all required response actions have not been completed
- **Category 2d.** Facilities where release, disposal, and/or migration of petroleum products have occurred but required response actions have not yet been implemented
- **Category 2e.** Facilities that are not evaluated or require additional investigation. Category 2e facilities include areas that may have had a release of petroleum products, but have had no sampling or field screening and require such investigation to confirm that a release has or has not occurred.

Table 3: RCRA Facility Assessment Sites

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
<b>Navy Sale Parcel I</b>							
I-A	RFA 28	10/Aero Club	Fuel Spill Site	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	2a
I-A	RFA 69	262	Drum Storage Area	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Not located during RFA; no releases identified. Photographs of drum storage areas were taken during a site visit by the DHS on October 29, 1980. NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1



Table 3: RCRA Facility Assessment Sites

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	RFA 157	626	Vehicle Wash Rack	Site Verification at Former Vehicle Washrack at the Hobby Shop, SWMU Number 157, Petroleum Corrective Action Program 11/19/1999  by NAVFAC EFD Southwest	RWQCB 3/31/2000	Inactive vehicle wash rack. Site was identified in the RFA and has been investigated. Further action was required; the site was addressed as part of compliance program. The site lies within the boundaries of IRP Site 20, but was not to be addressed under the IRP. Fieldwork was completed in 1998. RWQCB is regulatory agency lead; agency concurred with NFA recommendation in a letter dated 3/31/00. No further action required.	2b
I-A	RFA 219	766	Vehicle Wash Rack	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group  and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Inactive vehicle wash rack. OWS 766A is associated with this wash rack. NFA status identified in Final RFA Report (JEG 1993) and DTSC concurred in a letter dated 7/23/96. No further action required.	1
I-A	RFA 305	601	Septic Tank	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group  and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Site is inactive. NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1

Table 3: RCRA Facility Assessment Sites

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	RFA 306	687	Septic Tank	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Site is inactive. NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1
<b>Navy Sale Parcel II</b>							
II-A	RFA 1	Near golf course	Former Scrap Metal Yard	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Site visits conducted as part of the RFA and the 1995 EBS found no evidence of the Former Scrap Metal Yard. NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1

Table 3: RCRA Facility Assessment Sites

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	RFA 2	Near golf course	Vegetation Piles	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Only storage of wastes were identified during a 1991 site visit conducted as part of the RFA. NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1
II-A	RFA 46	163	Vehicle Maintenance and Parking/DRMO	Closure Report, SWMU 46 5/28/1999 by OHM and Supplement to Closure Report, SWMU 46 by OHM	DTSC 8/10/1999	TRPH was identified during RFA sampling visit. DTSC concurred with NFA in a letter dated 8/10/1999. No further action required.	3
II-A	RFA 96	343	Former hazardous/ flammable materials (oxygen) storage area (Building 343 was demolished in 1986)	Summary Report, Solid Waste Management Unit (SWMU) 96, Phantom Drum Storage Area 4/30/2002 by NAVFAC EFD Southwest	DTSC 11/5/2002	No releases were identified during RFA sampling visit. DTSC concurred with NFA in a letter dated 11/5/2002. No further action required.	1

Table 3: RCRA Facility Assessment Sites

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	RFA 125	415	< 90-Day Accumulation Point	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	No analytes were detected above action levels during RFA sampling visit. NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	3
II-A	RFA 134	454	< 90-Day Accumulation Point	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Not located during RFA; no releases identified. NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1
II-A	RFA 136	461 (on tarmac)	Aircraft Wash Area	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Aircraft wash area situated on tarmac. Site is inactive. OWS 461A is associated with this wash rack. NFA status identified in Final RFA Report (JEG 1993) and DTSC concurred with NFA recommendation in a letter dated 7/23/96. No further action required.	1

Table 3: RCRA Facility Assessment Sites

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	RFA 141	463/845	Aircraft Wash Area	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Aircraft wash area. Site is inactive. OWS 845 is associated with this wash rack, and both are associated with Building 463. NFA status identified in Final RFA Report (JEG 1993) and DTSC concurred in a letter dated 7/23/96. No further action required.	1
II-A	RFA 142	463	Drum Storage Area	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Not located during RFA; no releases identified. Photographs of drum storage areas were taken during a site visit by the DHS on October 29, 1980. NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1
II-A	RFA 237	1700	< 90-Day Accumulation Point	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Not located during RFA; no releases identified. NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1

Table 3: RCRA Facility Assessment Sites

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	RFA 245	464	Golf Course	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1
II-A	RFA 246	459	Golf Course Irrigation Pipeline	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1
II-A	RFA 260	389	Former Aboveground Storage Tank near Building 673	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	2a

Table 3: RCRA Facility Assessment Sites

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	RFA 270	817	Vehicle Wash Rack	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Inactive vehicle wash rack. NFA status identified in Final RFA Report (JEG 1993) and DTSC concurred in a letter dated 7/23/96. No further action required.	2b
II-A	RFA 297	Northeast of golf course	Former Asphalt Pavement Plant	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1
II-A	RFA 301	East side of Runway 34R	Mark Arrest System	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1

Table 3: RCRA Facility Assessment Sites

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	RFA 302	West side of Runway 34R	Mark Arrest system	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1
<b>Navy Sale Parcel III</b>							
III-A	RFA 9	East of Agua Chinon Wash	Fuel Bladder	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	2a



Table 3: RCRA Facility Assessment Sites

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
<b>Stationwide</b>							
Stationwide	RFA 12	N/A	Active Sanitary Sewer Lines	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1
Stationwide	RFA 247	Southwest and Southeast portions of installation	Irrigation Pipeline	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	NFA status identified in Final RFA Report (JEG 1993) and regulatory concurrence obtained. No further action required.	1

Table 3: RCRA Facility Assessment Sites

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
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Notes: Sites noted with a SWMU designation were originally identified during the RFA and were subsequently categorized as an RFA LOC.

The RFA study initially identified 305 SWMU/AOCs for further evaluation, of which 3 were located at MCAS Tustin, 15 were duplicates, and 4 were phantom sites. Of the remaining 283, 8 were addressed in the IRP; 1 addressed as PCB LOC; 76 addressed as UST LOCs; 30 addressed as OWS LOCs; 66 addressed as TAA LOCs; and 102 addressed as RFA LOCs. Of these 102, 9 were deleted as phantom or non-existent during 2002, with a remaining total of 93 RFA LOCs. The FOST includes 26 RFA LOCs with complete NFA information. See Attachment 1 for agency closure letters.

All RFA sites listed in Table 3 are previously-identified LOCs and the following apply to each site:

- No further action is required as per Regulatory Agency Concurrence Letter (date listed) based on Closure Report (date listed).
- The allowable use is residential as long as the applicable notifications and restrictions outlined in Section 5 of this FOST are adhered to.
- No engineering controls, institutional controls, or restrictions are required for any of the LOCs. Relevant notifications and restrictions for buildings/structures/facilities associated with LOCs are summarized in Table 16a/b.
- Operation and Maintenance requirements are not applicable.
- Public outreach activities were effected through the public comment period for the FOST (April 28 to May 28, 2003 and May 3 to June 17, 2004) and Restoration Advisory Board meetings. Pertinent information can be found at <http://www.efds.w.navy.mil/environmental/envhome.htm>.

Source: Earth Tech 2003.

<	=	less than
DHS	=	Department of Health Services
DRMO	=	Defense Reutilization and Marketing Office
DTSC	=	Department of Toxic Substances Control
EBS	=	Environmental Baseline Survey
ECP	=	Environmental Condition of Property
FOST	=	Finding of Suitability to Transfer
ID	=	Identification
LOC	=	Location of Concern
NAVFAC EFD Southwest	=	Southwest Division Naval Facilities Engineering Command, San Diego
N/A	=	Not Applicable
NFA	=	No Further Action
OWS	=	Oil/Water Separator
RCRA	=	Resource Conservation and Recovery Act
RFA	=	RCRA Facility Assessment
RWQCB	=	Regional Water Quality Control Board
TRPH	=	Total Recoverable Petroleum Hydrocarbons

Table 4: Temporary Accumulation Area Sites

Transfer Parcel	TAA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
<b>Navy Sale Parcel I</b>							
I-A	TAA 10	10	< 90-Day Accumulation Point	Closure Report, TAA 10 11/7/2002 by IT	DTSC 3/4/2003	SWMU/AOC 27. Sampling results exceeded residential PRGs. Additional sampling was conducted in September 2002. Concentrations did not exceed PRGs; Based on risk screening results, DTSC concurred with NFA in a letter dated 3/4/2003. The 2002 VSI conducted in support of the EBS did not identify visible signs of a release. No further action required.	3
I-A	TAA 77	77	< 90-Day Accumulation Point	Closure Report, TAA 77 12/23/1998 by OHM	DTSC 3/9/1999	Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	3
I-A	TAA 289	289	< 90-Day Accumulation Point	Closure Report, Former TAA 289 3/28/2001 by OHM	DTSC 10/10/2003	SWMU/AOC 70. Sampling results indicated concentrations of contaminants between residential and industrial PRGs; additional human health risk analysis was conducted based on future land use. Based on risk screening results, DTSC concurred with NFA in a letter dated 10/10/2003. No further action required.	3
I-A	TAA 626	626	< 90-Day Accumulation Point	Summary Report, TAA 626 8/15/2001 by NAVFAC EFD Southwest	DTSC 8/20/2001	SWMU/AOC 158. Summary report prepared 15 August 2001 recommended NFA and regulatory concurrence obtained. No further action required.	3
I-A	TAA 744	744	< 90-Day Accumulation Point	Closure Report, Temporary Accumulation Area (TAA) 744 11/17/2003	DTSC 4/7/2004	Concrete pad is in excellent condition, and no stains or evidence of a release were visible during the 2002 VSI conducted in support of the EBS. Soil samples were collected in August 2003. Based on sampling results, NFA was recommended. DTSC concurred with NFA in a letter dated 4/7/2004.	3

Table 4: Temporary Accumulation Area Sites

Transfer Parcel	TAA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
<b>Navy Sale Parcel II</b>							
II-A	TAA 389A	389	< 90-Day Accumulation Point	Final Closure Report, TAA 389A and 389B 9/17/1999	DTSC 11/24/1999	SWMU/AOC 119. Site closure and regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	3
II-A	TAA 389B	389	< 90-Day Accumulation Point	Final Closure Report, TAA 389A and 389B 9/17/1999	DTSC 11/24/1999	SWMU/AOC 259. Site closure and regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	3
II-A	TAA 441	441	< 90-Day Accumulation Point	Closure Report, TAA 441 2/23/2001 by OHM	DTSC 10/30/2003	SWMU/AOC 256. RFA sampling results conducted while TAA was operational indicated residual contaminants. After operation closure, additional sampling was conducted. Closure report was submitted in February 2001. Based on risk screening results, DTSC concurred with NFA. No further action required.	3
II-A	TAA 461	461/916	< 90-Day Accumulation Point	Closure Report, Temporary Accumulation Area (TAA) 461 10/16/2003	DTSC 4/5/2004	SWMU/AOC 138. Sampling results below residential PRGs. NFA was recommended; DTSC concurred with NFA in a letter dated 4/5/2004. No further action required.	3
II-A	TAA 462	462/917	< 90-Day Accumulation Point	Summary Report, Temporary Accumulation Area (TAA) 462 9/12/2002	DTSC 4/6/2004	SWMU/AOC 140. No evidence of a release during numerous site visits. NFA was recommended; DTSC concurred with NFA in a letter dated 4/6/2004. No further action required.	1

Table 4: Temporary Accumulation Area Sites

Transfer Parcel	TAA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	TAA 636	636	< 90-Day Accumulation Point	Closure Report, Former TAAs 636A and 636B 11/6/2002  by IT	DTSC 9/29/2003	SWMU/AOC 160. Sampling results below residential PRGs. No further action required.	3
II-A	TAA 856	856	< 90-Day Accumulation Point	Closure Report, TAA 856 4/2003	DTSC 10/30/2003	SWMU/AOC 234. Sampling results below residential PRGs. No further action was recommended. DTSC concurred with NFA in a letter dated 10/30/2003. No further action required.	3

Notes: For sites that received NFA concurrence after the September 2003 Final EBS (Earth Tech 2003), additional site-specific information is provided.

Sites noted with a SWMU/AOC designation were originally identified during the RFA and were subsequently categorized as a TAA LOC.

All TAA sites listed in Table 4 are previously-identified LOCs and the following apply to each site:

- No further action is required as per Regulatory Agency Concurrence Letter (date listed) based on Closure Report (date listed).
- The allowable use is residential as long as the applicable notifications and restrictions outlined in Section 5 of this FOST are adhered to.
- No engineering controls, institutional controls, or restrictions are required for any of the LOCs. Relevant notifications and restrictions for buildings/structures/facilities associated with LOCs are summarized in Table 16a/b.
- Operation and Maintenance requirements are not applicable.
- Public outreach activities were effected through the public comment period for the FOST (April 28 to May 28, 2003 and May 3 to June 17, 2004) and Restoration Advisory Board meetings. Pertinent information can be found at <http://www.efds.w.navy.mil/environmental/envhome.htm>.

Source: Earth Tech 2003.

<	=	less than
AOC	=	Area of Concern
DTSC	=	Department of Toxic Substances Control
EBS	=	Environmental Baseline Survey
ECP	=	Environmental Condition of Property
FOST	=	Finding of Suitability to Transfer
ID	=	Identification
LOC	=	Location of Concern
NAVFAC EFD Southwest	=	Southwest Division Naval Facilities Engineering Command, San Diego
NFA	=	No Further Action
PRG	=	Preliminary Remediation Goal
RFA	=	Resource Conservation and Recovery Act (RCRA) Facility Assessment
SWMU	=	Solid Waste Management Unit
TAA	=	Temporary Accumulation Area
VSI	=	Visual Site Inspection

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
<b>Navy Sale Parcel I</b>							
I-A	APHO 1	Tank Farm No. 3	Stains and Wet Soil	Summary Report and Summary Report Addendum, APHO 1 1/27/2000 and 4/11/2000  by NAVFAC EFD Southwest	DTSC 7/6/2000 RWQCB 10/18/2000	The review of historical documents and maps and site inspections, including the 2002 VSI conducted as part of the EBS, were conducted as part of this site evaluation. Soil sampling results obtained during the removal of Tank Farm 3 were found to be below residential PRGs. As a result, regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	3
I-A	APHO 5	50	Open Storage Area	Summary Report, APHO 5, Open Storage Area 6/21/1999  by NAVFAC EFD Southwest	DTSC 7/21/1999 EPA 10/6/1999 RWQCB 10/18/2000	Military family housing area. No evidence of a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
I-A	APHO 10	286	Open Storage Area	Summary Report, APHO 10, Former Open Storage Area 8/31/1999  by NAVFAC EFD Southwest	DTSC 10/6/1999 EPA 11/4/1999 RWQCB 3/31/2000	Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
I-A	APHO 15	Tank Farm No. 3	Stains and Wet Soil	Summary Report, APHO 15 2/8/00  by NAVFAC EFD Southwest	DTSC 5/4/2000 RWQCB 10/18/2000	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	APHO 16	Tank Farm No. 3	Stains and Wet Soil	Summary Report, APHO 16 & APHO 34 10/22/1999 by NAVFAC EFD Southwest	DTSC 12/20/1999 RWQCB 3/31/2000	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
I-A	APHO 22	9	Drums and Stains	Summary Report, APHO 22, Stains and Possible Drums 5/30/2000 by NAVFAC EFD Southwest	DTSC 6/14/2000 RWQCB 10/18/2000	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
I-A	APHO 23	14	Drums and Stains	Summary Report, APHOs 23, 27, 58 (Area 2) 3/7/2000 by NAVFAC EFD Southwest	RWQCB 10/18/2000	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Sampling results below residential PRGs. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	2a
I-A	APHO 29	10	Stains and Wet Soil	Summary Report, APHO 29 & APHO 52 7/2/1999 by NAVFAC EFD Southwest	DTSC 8/24/1999 EPA 10/6/1999 RWQCB 10/18/2000	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
I-A	APHO 30	Bordiers Nursery	Drums and Stains	Summary Report, APHO 30 9/9/1999 by NAVFAC EFD Southwest	DTSC 10/13/1999 EPA 11/4/1999 RWQCB 3/31/2000	Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	APHO 32	DRMO Yard No. 3	Stains and Wet Soil	Summary Report, APHO 32 3/3/2000 by NAVFAC EFD Southwest	DTSC 6/14/2000 RWQCB 11/6/2000	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
I-A	APHO 33	256	Open Storage Area	Summary Report, APHO 33, Probable Open Storage Area 7/28/99 by NAVFAC EFD Southwest	DTSC 8/16/1999 EPA 10/6/1999 RWQCB 10/6/1999	No evidence of staining or a release identified during records review and site visits, including the 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
I-A	APHO 34	DRMO Yard No. 3	Stains and Wet Soil	Summary Report, APHO 16 & APHO 34 10/22/1999 by NAVFAC EFD Southwest	DTSC 12/20/1999 RWQCB 3/31/2000	No evidence of staining or a release identified during records review and site visits, including the 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
I-A	APHO 40	279	Open Storage Area	Summary Report APHO 40, Probable Drums 9/30/2003 by NAVFAC EFD Southwest and Response to Comments, APHO 40 10/15/1999 and 12/27/1999	DTSC 1/27/2000	Records reviews, site visits, and comparison of LOCs in the vicinity of the site identified no evidence of releases. No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1



Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	APHO 41	624	Stains and Wet Soil	Summary Report, APHO 41, Stains or Wet Soil 9/22/1999 by NAVFAC EFD Southwest	DTSC 10/18/1999 EPA 11/4/1999 RWQCB 3/31/2000	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
I-A	APHO 53	Perimeter Road and Magazine Road	Drums and Stains	Summary Report, APHO 53, Stains and Possible Drums 10/4/1999 by NAVFAC EFD Southwest	DTSC 12/13/1999 RWQCB 10/18/2000	Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
I-A	APHO 58	Tank Farm No. 3	Open Storage Area	Summary Report, APHOs 23, 27, 58 (Area 2) 3/7/2000 by NAVFAC EFD Southwest	RWQCB 10/18/2000	Sampling results below residential PRGs. Site evaluated as Anomaly Area 2. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	3
I-A	APHO 108	279	Liquid	Information Package, APHOs 108, 121, and 123 6/09/2003 by NAVFAC EFD Southwest and NFA Determination for APHOs (site visit by DTSC on 6/13/2003)	DTSC 6/25/2003 RWQCB 8/14/2003	Identified on a 1974 photograph. The photograph noted liquid flowing adjacent to this facility. The facility is a Bachelor Officer Quarters and is part of a group of similar facilities. A drainage channel is located in this area and it is possible that water from irrigation or a previous storm was flowing in the channel. Based on a Visual Site Inspection conducted in June 2003, DTSC and RWQCB concurred with NFA. No further action required.	1

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	APHO 123	15	Liquid Flowing	Information Package, APHOs 108, 121, and 123 6/09/2003 NAVFAC EFD Southwest and NFA Determination for APHOs (site visit by DTSC on 6/13/2003)	DTSC 6/25/2003 RWQCB 8/14/2003	Identified on a 1988 photograph. APHO 123 is located adjacent to APHOs 16 and 34. These APHOs received a no further action declaration in 1999 after investigation. Facility 15 is identified as an electronics and communications maintenance shop. A drainage channel passes between the facility and West Marine Way. It is possible that storm or irrigation runoff is the liquid flowing that was noted in the photograph. Based on a Visual Site Inspection conducted in June 2003, DTSC and RWQCB concurred with NFA. No further action required.	1
I-A	APHO 124	52/692	Wet Soil	Information Package, APHO 124 4/30/2003 By NAVFAC EFD Southwest and NFA Determination for APHOs (site visit by DTSC on 6/13/2003)	DTSC 6/25/2003 RWQCB 8/14/2003	Identified on a 1988 photograph. The area of this APHO was visually inspected in 2002 and no evidence of a release was noted. Based on a Visual Site Inspection conducted in June 2003, DTSC and RWQCB concurred with NFA. No further action required.	1
<b>Navy Sale Parcel II</b>							
II-A	APHO 2	136	Open Storage Area	Summary Report, APHO 2, Open Storage Area 8/3/1999 by NAVFAC EFD Southwest	DTSC 8/19/1999 EPA 10/6/1999 RWQCB 3/31/2000	The area formerly used as an open drum storage area is now a concrete parking lot. No evidence of a release of wastes was identified during 2002 VSI conducted in support of the EBS. A visual inspection of the site conducted by the Navy in 1999 found no evidence of a release and resulted in an NFA recommendation. Regulatory agency concurrence of NFA recommendation has been obtained through a site closure letter. No further action required.	1

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	APHO 3	120	Open Storage Area	Summary Report, APHO 3, Open Storage Area 8/7/1999 by NAVFAC EFD Southwest	DTSC 8/30/1999 EPA 10/6/1999 RWQCB 3/31/2000	No evidence of a release identified during 2002 VSI conducted in support of the EBS. A visual inspection of the site conducted by the Navy in 1999 found no evidence of a release. Based on the site visit and a review of historical documents, the Navy recommended this site for NFA. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
II-A	APHO 4	Tank Farm No. 4	Stains and Wet Soil	Summary Report, APHO 4, Probable Soil Stains 7/28/1999 by NAVFAC EFD Southwest	RWQCB 10/6/1999 EPA 10/6/1999 DTSC 8/16/1999	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
II-A	APHO 12	DRMO Yard No. 2	Stains and Wet Soil	Summary Report, APHO 12 11/15/1999 by NAVFAC EFD Southwest	DTSC 2/1/2000 RWQCB 10/18/2000	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Limited detection of constituents of concern at surrounding LOCs. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	3
II-A	APHO 13	415	Open Storage Area	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999 EPA 10/6/1999	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
II-A	APHO 14	Horse Stables	Stains and Wet Soil	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999 EPA 10/6/1999	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	APHO 21	DRMO Yard No. 2	Open Storage Area	Summary Report, APHO 20 & APHO 21 11/30/1999 by NAVFAC EFD Southwest	DTSC 3/3/2000	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
II-A	APHO 24	Runways 34L and 34R	Disturbed Ground and Excavation	Summary Report, APHO 24, Area of Extraction 6/14/2000 by NAVFAC EFD Southwest	DTSC 7/14/2000 RWQCB 10/18/2000	Geophysical survey did not identify the presence of non-native/fill materials. Additionally, no evidence of ground disturbance identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
II-A	APHO 28	138	Stains and Wet Soil	Summary Report, APHO 28, Liquids Flowing East of Building 138 8/24/1999 by NAVFAC EFD Southwest	DTSC 9/10/1999 RWQCB 10/6/1999 EPA 11/4/1999	No evidence of staining or a release identified during records review and site visits, including the 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
II-A	APHO 31	Golf Course – Hole No. 5	Disturbed Ground and Excavation	Summary Report, Anomaly Area 5 (APHOs 31, 43, 66, 67, & 68) 11/1/2000 by OHM and Addendum to Summary Report, Anomaly Area 5 5/9/2001 by OHM	DTSC 2/11/2003 RWQCB 10/11/2001	Geophysical survey and soil sampling were conducted. Geophysical survey results indicated possible debris, which was verified to be interference from a clay layer and roadbed material. Soil sampling results indicated concentrations below PRGs. No evidence of ground disturbance identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been received. Site evaluated as Anomaly Area 5. No further action required.	3

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	APHO 35	137	Open Storage Area	Summary Report, APHO 35, Former Open Storage Area 8/31/2000  by NAVFAC EFD Southwest	DTSC 10/6/1999 RWQCB 10/6/1999  EPA 11/4/1999	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
II-A	APHO 36	291	Stains and Wet Soil	Summary Report, APHO 36, Probable Wet Soil 10/5/1999  by NAVFAC EFD Southwest	DTSC 12/13/1999 RWQCB 3/31/2000	Records reviews, site visits, and comparison of LOCs in the vicinity of the site identified no evidence of releases. No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
II-A	APHO 39	381	Stains and Wet Soil	Summary Report, APHO 39 & APHO 49 10/18/1999  by NAVFAC EFD Southwest	DTSC 12/16/1999 RWQCB 10/18/2000	Records reviews, site visits, and comparison of LOCs in the vicinity of the site identified no evidence of releases. No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
II-A	APHO 43	Golf Course – Hole No. 5	Disturbed Ground and Excavation	Summary Report, Anomaly Area 5 (APHOs 31, 43, 66, 67, & 68) 11/1/2000 by OHM  and Addendum to Summary Report, Anomaly Area 5 5/9/2001 by OHM	DTSC 2/11/2003 RWQCB 10/11/2001	Geophysical survey and soil sampling were conducted. Geophysical survey results indicated possible debris, which was verified to be interference from a clay layer and roadbed material. Soil sampling results indicated concentrations below PRGs. No evidence of ground disturbance identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrency of NFA recommendation has been received. Site evaluated as Anomaly Area 5. No further action required.	3

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	APHO 45	415	Stains and Wet Soil	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999 EPA 10/6/1999	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
II-A	APHO 47	Horse Stables	Open Storage Area	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999 EPA 10/6/1999	No evidence of a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
II-A	APHO 48	415	Open Storage Area	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999 EPA 10/6/1999	No evidence of a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1
II-A	APHO 49	Runways 34R and 7L	Stains and Wet Soil	Summary Report for APHO 39 & APHO 49 10/18/1999 by NAVFAC EFD Southwest	DTSC 12/16/1999 RWQCB 10/18/2000	Records reviews, site visits, and comparison of LOCs in the vicinity of the site identified no evidence of releases. No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	APHO 66	841	Disturbed Ground and Excavation	Summary Report, Anomaly Area 5 (APHOs 31, 43, 66, 67, & 68) 11/1/2000 by OHM and Addendum to Summary Report, Anomaly Area 5 5/9/2001 by OHM	RWQCB 10/11/2001 DTSC 2/11/2003	Geophysical survey and soil sampling were conducted. Geophysical survey results indicated possible debris, which was verified to be interference from a clay layer and roadbed material. Soil sampling results indicated concentrations below PRGs. No evidence of ground disturbance identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrency of NFA recommendation has been received. Site evaluated as Anomaly Area 5. No further action required.	3
II-A	APHO 67	841	Disturbed Ground and Excavation	Summary Report, Anomaly Area 5 (APHOs 31, 43, 66, 67, & 68) 11/1/2000 by OHM and Addendum to Summary Report, Anomaly Area 5 5/9/2001 by OHM	DTSC 2/11/2003	Geophysical survey and soil sampling were conducted. Geophysical survey results indicated possible debris, which was verified to be interference from a clay layer and roadbed material. Soil sampling results indicated concentrations below PRGs. No evidence of ground disturbance identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrency of NFA recommendation has been received. Site evaluated as Anomaly Area 5. No further action required.	3
II-A	APHO 68	841	Open Storage Area	Summary Report, Anomaly Area 5 (APHOs 31, 43, 66, 67, & 68) 11/1/2000 by OHM and Addendum to Summary Report, Anomaly Area 5 5/9/2001 by OHM	RWQCB 10/11/2001 DTSC 2/11/2003	Geophysical survey and soil sampling were conducted. Geophysical survey results indicated possible debris, which was verified to be interference from a clay layer and roadbed material. Soil sampling results indicated concentrations below PRGs. No evidence of ground disturbance identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrency of NFA recommendation has been received. Site evaluated as Anomaly Area 5. No further action required.	3

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	APHO 69	Stable Area	Possible Pit	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999	Identified on a 1990 photograph, area was addressed with the Stable Area Anomalies. No further action required.	1
II-A	APHO 70	Stable Area	Excavation and Stain	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999	Identified on a 1960 photograph. Stained area and excavation may be related to stable activities and was addressed with the Stable Area Anomalies. No further action required.	1
II-A	APHO 71	1798	Liquid Flowing	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999	Identified on a 1967 photograph. Reported liquid flowing from building. Building is part of the stable area and was evaluated with the Stable Area Anomalies. No further action required.	1
II-A	APHO 72	1798	Liquid Flowing	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999	Identified on a 1968 photograph. Reported liquid flowing from building. Building is part of the stable area and was evaluated with the Stable Area Anomalies. No further action required.	1
II-A	APHO 73	Stable Area	Disturbed Ground	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999	Identified on a 1973 photograph. Disturbed ground and excavation areas noted in the area of the stables. DTSC recommended investigation in May 1999. Site was investigated with the Stable Area Anomalies. No further action required.	1



Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	APHO 74	Stable Area	Liquid Flowing	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999	Identified on a 1976 photograph. Reported liquid flowing from building. Building is part of the stable area and was evaluated with the Stable Area Anomalies. No further action required.	1
II-A	APHO 75	415	Drum Storage	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999	Identified on a 1976 photograph. Noted drums were stored around the building and that liquid was noticed in the area of the drums. The area was addressed with the Stable Area Anomalies. No further action required.	1
II-A	APHO 76	Stable Area	Unidentified Objects	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999	Identified on a 1978 photograph. Photo showed 7 unidentified objects in a trench southwest of the stables. The area was evaluated as part of the Stable Area Anomalies. No further action required.	1
II-A	APHO 77	Stable Area	Rodeo Area	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999	Identified on a 1979 photograph. Area addressed as part of the Stable Area Anomalies. No further action required.	1
II-A	APHO 78	415	Stains or Wet Soil	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999	Identified on a 1987 photograph. Wet soil near the building. Area investigated as part of the Stable Area Anomalies. No further action required.	1

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	APHO 79	Stable Area	Site Grading	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999	Identified on a 1987 photograph. Area evaluated as part of the Stable Area Anomalies. No further action required.	1
II-A	APHO 80	Stable Area	Stains and Disturbed Ground	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999	Identified on a 1988 photograph. Noted that dark mounded material and stained area in an industrial site at the southwestern corner of the agricultural area. No investigation was recommended unless contamination was detected at, or downgradient of, the site. Area was evaluated as part of the Stable Area Anomalies. No further action required.	1
II-A	APHO 81	Stable Area	Disturbed Ground	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 8/10/1999	Identified on a 1988 photograph. Investigation was recommended due to disturbed soil, mounded soil and buildings located to the northwest expansion of the rodeo/ stable area. In addition, a disturbed area that may have been a backfilled trench was in the area. An investigation of the area was conducted during the evaluation of the Stable Area Anomalies. No further action required.	1
II-A	APHO 82	Stable Area	Unidentified Object	Summary Report for Stable Area APHOs 6/14/1999 by NAVFAC EFD Southwest	DTSC 08/10/1999	Identified on a 1992 photograph. A new building and an unidentified object (possibly a tank or circular horse training area) were noted. The area was evaluated with the Stable Area Anomalies and a circular track was noted during a visual inspection in 1999. No further action required.	1

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	APHO 85	294	Trench	Information Package, APHO 85 4/21/2003 by NAVFAC EFD Southwest  and NFA Determination for APHO's (site visit by DTSC on 6/13/2003)	DTSC 6/25/2003 RWQCB 8/14/2003	Identified on a 1946 photograph. A trench or drainage channel is located in this area. The trench is located near several potential contamination sources. IRP Site 19, IRP Site 25-Agua Chinon Wash, TAA 371A (SWMU 107), TAA 371B (SWMU 242), and a segment of a JP-5 pipeline (MSC JP5) are all near this trench or drainage channel. The sampling conducted for these sites are considered representative for APHO 85 and all sites have achieved a no further action status. No further action required.	3
II-A	APHO 87	14th Street and S Street	Vertical Tank	Information Package, APHOs 87, 90, 98, 99, 100, and 109 5/2003 by NAVFAC EFD Southwest  and NFA Determination for APHO's (site visit by DTSC on 6/13/2003)	DTSC 6/25/2003 RWQCB 8/14/2003	Identified on a 1952 photograph. Two possible tanks were noted in the picture. Investigation of the area has not found evidence of tanks or tank supporting structures. During the time of the photo, temporary water tanks were used for military housing construction and may be the tanks noted in the photo. No further action required.	1
II-A	APHO 90	Q Street and 9th Street	Unidentified Object	Information Package, APHOs 87, 90, 98, 99, 100, and 109 5/2003 by NAVFAC EFD Southwest  and NFA Determination for APHO's (site visit by DTSC on 6/13/2003)	DTSC 6/25/2003 RWQCB 8/14/2003	Identified on a 1960 photograph. Object was considered a possible incinerator or chimney. Adjacent structures in the area include a former paint shop that has a mezzanine section that could be interpreted as a chimney and a former incinerator was located in the general vicinity of the APHO. The APHO could be the incinerator located at Facility 140/140A. This possibility, and the lack of other evidence in the area, provides the basis for no further action. No further action required.	1

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	APHO 91	Runways	Trench	Information Package, APHOs 83, 91, and 92 4/17/2003 by NAVFAC EFD Southwest and NFA Determination for APHO's (site visit by DTSC on 6/13/2003)	DTSC 6/25/2003	Identified on a 1960 photograph. A small drainage trench was noted on the photograph, this trench could be linked to the Bee Canyon Wash. The trench is similar to other drainage trenches located throughout the installation. No further action required.	1
II-A	APHO 93	Perimeter Road	Excavation	Summary Report, APHO 93 and APHO 97 1/28/2004	DTSC 3/18/2004 RWQCB 3/22/2004	Identified on a 1961 photograph. Excavation was noted near Perimeter Road. APHO 97 (consisting of a trench and disturbed ground) is near APHO 93. No evidence of waste disposal activities was observed during Visual Site Inspections conducted in November 2003, December 2003, and January 2004. DTSC concurred with NFA in a letter dated 3/18/2004 and RWQCB concurred with NFA in a letter dated 3/22/2004.	1
II-A	APHO 94	Drop Tank Drainage Area No. 1	Wet Soil	Summary Report, Aerial Photograph Anomaly (APHO) 94 and APHO 115 4/23/2003	DTSC 4/12/2004	Identified on a 1961 photograph. This site is located near the runways, which were investigated as a potential release location. NFA was recommended based on visual inspections conducted in September 2002; DTSC concurred with the NFA recommendation in a letter dated 4/12/2004. No further action is required.	1

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	APHO 95	457	Stains and Wet Soil	Memorandum, Response to Comment 5, DTSC Letter dated 12 May 1999, Aerial Photograph Anomalies 4/14/2003 by NAVFAC EFD Southwest  and  NFA Determination for APHO's (site visit by DTSC on 6/13/2003)	DTSC 6/25/2003	Identified on a 1961 photograph. Stains or wet soil was noted in the street near Facility 457. This area has been investigated as part of the APHO 12 and TAA 636A and TAA 636B (SWMU 160) investigations. No evidence of staining was noted. No further action required.	1
II-A	APHO 97	358	Trench and Disturbed Ground	Summary Report, APHO 93 and APHO 97 1/28/2004	DTSC 3/18/2004 RWQCB 3/22/2004	Identified on a 1964 photograph. This area is located near the excavation area noted in APHO 93. These areas include a possible backfilled trench and mounded material. No evidence of waste disposal activities was observed during Visual Site Inspections conducted in November 2003, December 2003, and January 2004. DTSC concurred with NFA in a letter dated 3/18/2004 and RWQCB concurred with NFA in a letter dated 3/22/2004.	1
II-A	APHO 102	Tank 459	Excavation	Information Package, APHO 102 5/02/2003 by NAVFAC EFD Southwest  and  NFA Determination for APHOs (site visit by DTSC on 6/13/2003)	DTSC 6/25/2003	Identified on a 1967 photograph. A liquid filled excavation was noted in this photograph. Tank 459 is a water storage tank for the golf course. It is possible that water from the golf course accumulated in this area. DTSC concurred with recommendation of NFA. No further action required.	1

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	APHO 103	Approach end of Runway 34R	Impoundment	Information Package, APHO 103 1/14/2004	RWQCB 3/1/2004 DTSC 3/15/2004	Identified on a 1968 photograph. The impoundment is located between the railroad tracks and Perimeter Road near Runway 34R. No evidence of waste disposal activities was observed during Visual Site Inspections conducted in December 2003 and January 2004. RWQCB concurred with NFA in a letter dated 3/1/2004. DTSC concurred with NFA in a letter dated 3/15/2004.	1
II-A	APHO 104	Threshold of Runway 34R	Excavation	Information Package, APHO 104 6/18/2003 by NAVFAC EFD Southwest and NFA Determination for APHOs (site visit by DTSC on 6/13/2003)	DTSC 6/25/2003	Identified on a 1968 photograph. An excavation containing unidentifiable equipment was noted in this area. This area is in a location similar to the location of APHO 24. During the investigation of APHO 24, multiple subsurface utilities were noted passing through the area and no hazardous waste disposal areas were noted in the area. Given the similarity of location for APHO 104, it is possible that maintenance activity on these subsurface utilities may have been noted in the photograph. Based on a Visual Site Inspection conducted in June 2003, DTSC concurred with recommendation of NFA. No further action required.	1
II-A	APHO 115	Drop Tank Drainage Area No. 1	Mounded Material	Summary Report, Aerial Photograph Anomaly (APHO) 94 and APHO 115 4/23/2003	DTSC 4/12/2004	Identified on a 1977 photograph. This APHO is in close proximity to IRP Site 6 (Drop Tank Drainage Area Number 1), the runway edge, which was investigated as a Potential Release Location (PRL), and three other PRLs (350A, 350B and 350C) where former effluent tanks were located. NFA was recommended based on visual inspections conducted in September 2002; DTSC concurred with the NFA recommendation in a letter dated 4/12/2004. No further action is required.	1
Navy Sale Parcel I/II							

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A and II-A	APHO 83	Runway Area	Drainage Channel	Information Package, APHOs 83, 91, and 92 4/17/2003 by NAVFAC EFD Southwest and NFA Determination for APHO's (site visit by DTSC on 6/13/2003)	DTSC 6/25/2003 RWQCB 8/14/2003	Identified on a 1946 photograph. A drainage channel located in this area may have allowed contaminated water from the apron area near Former Tank Farm 4 and the runways to enter Bee Canyon Wash. Based on a Visual Site Inspection conducted in June 2003, DTSC and RWQCB concurred with NFA. No further action required.	1
<b>Navy Sale Parcel III</b>							
III-A	APHO 116	38	Liquid	APHO Information Package, APHOs 116 and 117 5/1/2003 by NAVFAC EFD Southwest	DTSC 6/25/2003 RWQCB 8/14/2003	Identified on a 1979 photograph. The facility was used as a mess hall and currently is a storage area for the museum and meeting area for the Young Marines. The surrounding facilities are barracks. The area is irrigated and the liquid flowing in the photo may have been the water from the irrigation. A UST (UST 38) was removed from the area in 1997. This area was visually inspected in 2003 and no evidence of stains, liquid, or releases was observed. No further action required.	1
III-A	APHO 117	38	Wet Soil and Soil Staining	APHO Information Package, APHOs 116 and 117 5/1/2003 by NAVFAC EFD Southwest	DTSC 6/25/2003 RWQCB 8/14/2003	Identified on a 1979 photograph. The facility was used as a mess hall and currently is a storage area for the museum and meeting area for the Young Marines. The surrounding facilities are barracks. The area is irrigated and the liquid flowing in the photo may have been the water from the irrigation. This area was visually inspected in 2003 and no evidence of stains, liquid, or releases was observed. No further action required.	1
<b>Navy Sale Parcel II/III</b>							

Table 5: Aerial Photograph Anomaly Sites

Transfer Parcel	APHO ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A and III-A	APHO 8	Golf Course - Hole 12	Open Storage Area	Summary Report, APHO 8, Former Open Storage Area 9/22/1999  by NAVFAC EFD Southwest	DTSC 10/13/1999  EPA 11/04/1999  RWQCB 3/31/2000	No evidence of staining or a release identified during 2002 VSI conducted in support of the EBS. Regulatory agency concurrence of NFA recommendation has been obtained. No further action required.	1

Notes: For sites that received NFA concurrence after the September 2003 Final EBS (Earth Tech 2003), additional site-specific information is provided. All APHO sites listed in Table 5 are previously-identified LOCs and the following apply to each site:

- No further action is required as per Regulatory Agency Concurrence Letter (date listed) based on Closure Report (date listed).
- The allowable use is residential as long as the applicable notifications and restrictions outlined in Section 5 of this FOST are adhered to.
- No engineering controls, institutional controls, or restrictions are required for any of the LOCs. Relevant notifications and restrictions for buildings/structures/facilities associated with LOCs are summarized in Table 16a/b.
- Operation and Maintenance requirements are not applicable.
- Public outreach activities were effected through the public comment period for the FOST (April 28 to May 28, 2003 and May 3 to June 17, 2004) and Restoration Advisory Board meetings. Pertinent information can be found at <http://www.efds.w.navfac.navy.mil/environmental/envhome.htm>.

Source: Earth Tech 2003.

APHO	=	Aerial Photograph Features/Anomalies
DRMO	=	Defense Reutilization and Marketing Office
DTSC	=	Department of Toxic Substances Control
EBS	=	environmental baseline survey
ECP	=	Environmental Condition of Property
EPA	=	Environmental Protection Agency
FOST	=	Finding of Suitability to Transfer
ID	=	Identification
IRP	=	Installation Restoration Program
JP-5	=	Jet Propulsion Fuel, Grade 5
LOC	=	Location of Concern
NAVFAC EFD Southwest	=	Southwest Division Naval Facilities Engineering Command, San Diego
NFA	=	No Further Action
PRG	=	Preliminary Remediation Goal
SWMU	=	Solid Waste Management Unit
RWQCB	=	Regional Water Quality Control Board
TAA	=	Temporary Accumulation Area
UST	=	Underground Storage Tank
VSI	=	Visual Site Inspection



Table 6. Installation Restoration Program Sites

Transfer Parcel	IRP ID	Site Description	Material Disposed	Date of Operation	Status	Closure Report Title/Date	NFA Letter Agency/Date	Comments	Approximate Area (acres)	ECP Category
<b>Navy Sale Parcel I</b>										
I-A	IRP 20	Hobby Shop (OU-3)	Kerosene formerly used to wash down pavement, collected in OWSs that discharged to nearby drainage ditches; stained soil from petroleum products.	1967 to 1999	Site consisted of 4 units. Unit 3 was removed from the IRP and closed under the Petroleum Corrective Action Program on 11 September 1996. Unit 2 was removed from the IRP and was closed on 28 October 1997. ROD for Units 1 and 4 was signed in September 1997.	Draft Final Record of Decision, OU 2A & 3A, No Action Sites 9/30/1997	EPA, DTSC, RWQCB 9/30/1997	Hobby shop operated from 1967 to 1999; kerosene was replaced with biodegradable soap in 1976.	0.5	3
<b>Navy Sale Parcel II</b>										
II-A	IRP 6	Drop Tank Drainage Area No. 1 (OU-3)	Rinsed aircraft drop tanks. Waste included JP-5 and lubrication oils.	1969 to 1983	ROD signed in September 1997.	Draft Final Record of Decision, OU 2A & 3A, No Action Sites 9/30/1997	EPA, DTSC, RWQCB 9/30/1997	Includes SWMU/ AOC 236	3	3

Table 6. Installation Restoration Program Sites

Transfer Parcel	IRP ID	Site Description	Material Disposed	Date of Operation	Status	Closure Report Title/Date	NFA Letter Agency/Date	Comments	Approximate Area (acres)	ECP Category
II-A	IRP 19	Aircraft Expeditionary Refueling (ACER) Site (OU-3)	Fuel storage area experienced various fuel spills and leaks throughout operational history. A 20,000-gallon JP-5 spill was reported to have occurred. Affected soil was excavated and replaced. Unit 2 was backfilled with PCB contaminated soil originating from Site 8, Unit 3. The RI of the site indicated that site related contamination is limited to the shallow soil interval. The human health and ecological risk assessments showed that contaminants present in the soil do not present an unacceptable risk to human health or the environment.	1964 to 1986	Site consisted of 4 units. Unit 1 was closed by RWQCB on 14 May 1997. Unit 4 addressed with USTs 891A, B, and C. NFA ROD signed for units 2 and 3 in September 1997.	Draft Final Record of Decision, OU 2A & 3A, No Action Sites 9/30/1997	EPA, DTSC, RWQCB 9/30/1997	N/A	4	4

Table 6. Installation Restoration Program Sites

Transfer Parcel	IRP ID	Site Description	Material Disposed	Date of Operation	Status	Closure Report Title/Date	NFA Letter Agency/Date	Comments	Approximate Area (acres)	ECP Category
<b>Navy Sale Parcel III</b>										
III-A	IRP 13	Oil Change Area (OU-3)	Releases of crankcase oil.	1977-1983	ROD signed in September 1997.	Draft Final Record of Decision, OU 2A & 3A, No Action Sites 9/30/1997	EPA, DTSC, RWQCB 9/30/1997	N/A	1	3
<b>Stationwide</b>										
I-A, II-A, and III-A	IRP 25	Major Drainages (OU-2A)	Four drainage channels that flow through or adjacent to the Station and receive storm water discharges from the Station.  Concentrations of metals, pesticides, and petroleum products below levels requiring response actions were detected at the site.	N/A	ROD was signed in September 1997.	Draft Final Record of Decision, OU 2A & 3A, No Action Sites 9/30/1997	EPA, DTSC, RWQCB 9/30/1997	Includes SWMUs/AOCs 3, 4, 5, and 11	22	3

Table 6. Installation Restoration Program Sites

Transfer Parcel	IRP ID	Site Description	Material Disposed	Date of Operation	Status	Closure Report Title/Date	NFA Letter Agency/Date	Comments	Approximate Area (acres)	ECP Category
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Notes: Sites noted with a SWMU/AOC designation were originally identified during the RFA and were subsequently investigated as part of the IRP.

All IRP sites listed in Table 6 are previously-identified LOCs and the following apply to each site:

- No further action is required as per Regulatory Agency Concurrence Letter (date listed) based on Closure Report (date listed).
- The allowable use is residential as long as the applicable notifications and restrictions outlined in Section 5 of this FOST are adhered to.
- No engineering controls, institutional controls, or restrictions are required for any of the LOCs. Relevant notifications and restrictions for buildings/structures/facilities associated with LOCs are summarized in Table 16a/b.
- Operation and Maintenance requirements are not applicable.
- Public outreach activities were effected through the public comment period for the FOST (April 28 to May 28, 2003 and May 3 to June 17, 2004) and Restoration Advisory Board meetings. Pertinent information can be found at <http://www.efdsd.navfac.navy.mil/environmental/envhome.htm>.

Source: Earth Tech 2003.

AOC	=	Area of Concern
DTSC	=	Department of Toxic Substances Control
ECP	=	Environmental Condition of Property
EPA	=	Environmental Protection Agency
FOST	=	Finding of Suitability to Transfer
ID	=	Identification
IRP	=	Installation Restoration Program
JP-5	=	Jet Propulsion Fuel, Grade 5
LOC	=	Location of Concern
N/A	=	Not Applicable
NFA	=	No Further Action
OU	=	Operable Unit
OWS	=	Oil/Water Separator
RI	=	Remedial Investigation
ROD	=	Record of Decision
RWQCB	=	Regional Water Quality Control Board
SWMU	=	Solid Waste Management Unit
UST	=	Underground Storage Tank

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
<b>Navy Sale Parcel I</b>							
<b>Aboveground Storage Tanks</b>							
I-A	AST 146	146	85 Gallon Diesel Tank	Memorandum, AST Sites 146, 390A & 390B 12/3/2002  by NAVFAC EFD Southwest	RWQCB 12/30/2002	A partial removal of existing fuel was accomplished in November 2002. Tank was closed in place. RWQCB concurred with NFA in a letter dated 12/30/2002. No further action required.	2b
I-A	AST 376	376	50 Gallon Diesel Tank	Summary Report, Former AST 376 7/5/2000  by NAVFAC EFD Southwest	RWQCB 8/7/2000	Tank has been removed. A Site Summary Report dated July 2000 was reviewed by the RWQCB and the site was declared closed in July 2000. A release from a day tank associated with a backup generator to a concrete pad was noted during the 2002 VSI; no soil staining or release to the environment identified. NFA decision date of 8/7/2000. No further action required.	2b
I-A	AST 670	670	15000 Gallon Propane Tank	Information Package, Above Ground Storage Tank 670 10/15/2001  by NAVFAC EFD Southwest	Per BCT approval of 1995 EBS, DTSC 5/10/1995	Tank has been removed. Horizontal tank; no releases identified. Determination of NFA was by concurrence with the 1995 EBS. No further action required.  The Information Package is not a Closure Report. It was prepared subsequent to obtaining NFA concurrence to document and track the closure process.	1
I-A	AST 730	730	75 Gallon Diesel Tank	Tank Closure Report, AST 730 11/9/2000  by IT	RWQCB 1/17/2001	Tank has been removed. NFA decision date of 17 January 2001. No further action required.	2a
I-A	AST 797	797	1000 Gallon Waste Oil Tank	Tank Closure Report, AST 797 4/22/1998	RWQCB 3/17/1999	Horizontal tank; tank has been removed. NFA decision date of 17 March 1999. No further action required.	2a

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
<b>Underground Storage Tanks</b>							
I-A	UST 11	11	500 Gallon Diesel Tank	Site Assessment Report, Former Underground Storage Tank Sites 11 7/10/1996  by OHM	RWQCB 8/16/1996	Removal completed on 2/6/92. Site closed by RWQCB in a letter dated 8/16/96. No further action required.	2b
I-A	UST 12	12	500 Gallon Diesel Tank	Site Assessment Report, UST 12 8/1995  by Bechtel National	RWQCB 12/12/1995	Removal completed on 2/6/92. Site closed by RWQCB in a letter dated 12/12/95. No further action required.	2b
I-A	UST 13	13	500 Gallon Diesel Tank	Closure Report/Final Report, Tank 13 1/7/1992  by JTL	OCHCA 11/12/1996	Removal completed on 2/6/92. Site closed by OCHCA in a letter dated 11/12/96. No further action required.	2b
I-A	UST 14	14	500 Gallon Diesel Tank	Site Assessment Report, UST 14 7/1/1996 by Bechtel National  and Addendum to Site Assessment Report, UST 14 5/9/1997 by NAVFAC EFD Southwest	RWQCB 6/6/1997	Tank has been removed. Site closed by RWQCB in a letter dated 6/6/97. No further action required.	2b
I-A	UST 44	44	500 Gallon Diesel Tank	Site Assessment Report, Former UST Tank Site 44 11/23/1998  by OHM	RWQCB 3/31/2000	Tank has been removed. Site closed by RWQCB in a letter dated 3/31/00. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 45	45	500 Gallon Fuel Oil Tank	Site Assessment Report, Former UST Tank Site 45 11/30/1998  by OHM	RWQCB 3/31/2000	Tank has been removed. Site closed by RWQCB in a letter dated 3/31/00. No further action required.	2b
I-A	UST 53	53	500 Gallon Diesel Tank	Site Assessment Report, Former Underground Storage Tank Site 53 9/9/1996  by OHM	RWQCB 10/3/1996	Removal completed on 2/6/92. Site closed by RWQCB in a letter dated 10/3/96. No further action required.	2b
I-A	UST 54A	54	500 Gallon Diesel Tank	Site Assessment Report, Former Underground Storage Tank Site 54A 2/1996 by Bechtel National  and Addendum, Site Assessment Report, Former Underground Storage Tank Site 54A 8/12/1997  by NAVFAC EFD Southwest	RWQCB 8/22/1997	Removal completed on 2/4/92. Site closed by RWQCB in a letter dated 8/22/97. No further action required.	2b
I-A	UST 54B	54	500 Gallon Diesel Tank	Tank Removal Field Activities 5/4/1988	OCHCA 12/27/1996	Tank has been removed. Site closed by OCHCA in a letter dated 12/27/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 54C	54	1400 Gallon Diesel Tank	Tank Removal and Site Closure Report for UST 54C 4/30/1998  by OHM	RWQCB 4/5/1999	Tank has been removed. Site closed by RWQCB in a letter dated 4/5/99. No further action required.	2b
I-A	UST 55A	55	5000 Gallon Fuel Tank	Site Assessment Report, Underground Storage Tank Sites 55A and 55B 12/19/1997  by OHM	RWQCB 1/14/1998	Tank has been removed. Site closed by RWQCB in a letter dated 1/14/98. No further action required.	2b
I-A	UST 55B	55	5000 Gallon Fuel Tank	Site Assessment Report, Underground Storage Tank Sites 55A and 55B 12/19/1997  by OHM	RWQCB 1/14/1998	Tank has been removed. Site closed by RWQCB in a letter dated 1/14/98. No further action required.	2b
I-A	UST 56A	56	550 Gallon Diesel Tank	Tank Removal and Site Closure Report, UST 56A 10/15/1997  by OHM	OCHCA 10/31/1997	Removal completed on 4/7/97. Site closed by OCHCA in a letter dated 10/31/97. No further action required.	2b
I-A	UST 56B	56	1400 Gallon Fuel Oil Tank	Former Underground Tank Site 56B Site Assessment Report 6/3/1998	RWQCB 4/12/1999	Tank has been removed. Site closed by RWQCB in a letter dated 4/12/99. No further action required.	2b
I-A	UST 57	57	15000 Gallon Fuel Oil Tank	Tank Removal Field Activities 11/2/1993	OCHCA 12/2/1996	Removal completed on 2/28/94. Site closed by OCHCA in a letter dated 12/2/96. No further action required.	2b



Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 58	58	5300 Gallon Diesel Tank	Site Assessment Report, Former Underground Storage Tank Site 58 12/5/1997 by NAVFAC EFD Southwest	RWQCB 1/13/1998	Removal completed on 2/28/94. Site closed by RWQCB in a letter dated 1/13/98. No further action required.	2b
I-A	UST 59	59	5300 Gallon Diesel Tank	Tank Removal Field Activities 10/21/1993	OCHCA 12/2/1996	Removal completed on 2/28/94. Site closed by OCHCA in a letter dated 12/2/96. No further action required.	2b
I-A	UST 60	60	2000 Gallon Diesel Tank	Tank Removal and Site Closure Report, UST 60 10/31/1997 by OHM	OCHCA 12/10/1997	Removal completed on 7/15/97. Site closed by OCHCA in a letter dated 12/10/97. No further action required.	2b
I-A	UST 62	62	500 Gallon Fuel Oil Tank	Site Assessment Report, Underground Storage Tank Site 62 12/10/1997 by OHM	RWQCB 1/12/1998	Tank has been removed. Site closed by RWQCB in a letter dated 1/12/98. No further action required.	2b
I-A	UST 63A	63	500 Gallon Diesel Tank	Site Assessment Report, Former Underground Storage Tank Site 63 A/B 11/18/1996 by OHM	RWQCB 12/18/1996	Tank has been removed. Site closed by RWQCB in a letter dated 12/18/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 63B	63	500 Gallon Diesel Tank	Site Assessment Report, Former Underground Storage Tank Site 63 A/B 11/18/1996  by OHM	RWQCB 12/18/1996	Tank has been removed. Site closed by RWQCB in a letter dated 12/18/96. No further action required.	2b
I-A	UST 66A	66	1100 Gallon Diesel Tank	Site Assessment Report, UST 66A 7/1995  by Bechtel National	RWQCB 12/11/1995	Removal completed on 2/28/94. Site closed by RWQCB in a letter dated 12/11/95. No further action required.	2b
I-A	UST 66B	66	1500 Gallon Diesel Tank	Tank Removal and Site Closure Report, USTs 66B and 66C 10/31/1997  by OHM	OCHCA 12/10/1997	Removal completed on 8/12/97. Site closed by OCHCA in a letter dated 12/10/97. No further action required.	2b
I-A	UST 66C	66	1500 Gallon Diesel/Oil Tank	Tank Removal and Site Closure Report, USTs 66B and 66C 10/31/1997  by OHM	OCHCA 12/10/1997	Removal completed on 8/12/97. Site closed by OCHCA in a letter dated 12/10/97. No further action required.	2b
I-A	UST 67A	67	1500 Gallon Fuel Oil Tank	Site Assessment Report, Former Underground Storage Tank Sites 67A and 67B 1/4/2001	RWQCB 1/17/2001 OCHCA 1/19/2001	Tank has been removed. Site closed by RWQCB in a letter dated 1/17/01 and by OCHCA in a letter dated 1/19/2001. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 67B	67	1500 Gallon Fuel Oil Tank	Site Assessment Report, Former Underground Storage Tank Sites 67A and 67B 1/4/2001	RWQCB 1/17/2001 OCHCA 1/19/2001	Tank has been removed. Site closed by RWQCB in a letter dated 1/17/01 and by OCHCA in a letter dated 1/19/2001. No further action required.	2b
I-A	UST 69	69	500 Gallon Fuel Oil Tank	Closure Report/Final Report, Tank 69 3/5/1992 by JTL	OCHCA 11/6/1996	Removal completed on 2/6/92. No evidence of a release was identified. Site closed by OCHCA in a letter dated 11/6/96. No further action required.	1
I-A	UST 71	71	500 Gallon Fuel Oil Tank	Closure Report/Final Report, Tank 71 3/5/1992 by JTL	OCHCA 10/31/1996	Removal completed on 2/18/92. Site closed by OCHCA in a letter dated 10/31/96. No further action required.	2b
I-A	UST 73	73	500 Gallon Diesel Tank	Closure Report/Final Report, Tank 73 3/5/1992 by JTL	OCHCA 10/31/1996	Tank has been removed. Site closed by OCHCA in a letter dated 10/31/96. No further action required.	2b
I-A	UST 74	74	500 Gallon Diesel Tank	Closure Report/Final Report, Tank 74 1/7/1992 by JTL	OCHCA 11/13/1996	Tank has been removed. No evidence of a release was identified. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	1
I-A	UST 77	77	500 Gallon Diesel Tank	Closure Report/Final Report, Tank 77 3/5/1992 by JTL	OCHCA 11/6/1996	Removal completed on 2/6/92. No evidence of a release was identified. Site closed by OCHCA in a letter dated 11/6/96. No further action required.	1

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 78	78	500 Gallon Diesel Tank	Site Assessment Report, Former Underground Storage Tank Sites 78 7/10/1996  by OHM	RWQCB 8/16/1996	Tank has been removed. Site closed by RWQCB in a letter dated 8/16/96. No further action required.	2b
I-A	UST 79	79	500 Gallon Fuel Oil Tank	Site Assessment Report, Underground Storage Tank Site 79 9/9/1999  by OHM	RWQCB 9/28/2000	Tank has been removed. Site closed by RWQCB in a letter dated 9/28/00. No further action required.	2b
I-A	UST 80	80	500 Gallon Diesel Tank	Site Assessment Report, Former Underground Storage Tank Site 80 7/10/1996  by OHM	RWQCB 8/16/1996	Removal completed on 2/6/92. Site closed by RWQCB in a letter dated 8/16/96. No further action required.	2b
I-A	UST 81	81	500 Gallon Diesel Tank	Closure Report/Final Report, Tank 81 3/5/1992  by JTL	OCHCA 11/6/1996	Tank has been removed. No evidence of a release was identified. Site closed by OCHCA in a letter dated 11/6/96. No further action required.	1
I-A	UST 82	82	500 Gallon Diesel Tank	Closure Report/Final Report, Tank 82 1/7/1992  by JTL	OCHCA 11/12/1996	Tank has been removed. No evidence of a release was identified. Site closed by OCHCA in a letter dated 11/12/96. No further action required.	1

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 83A	83	1500 Gallon Fuel Oil Tank	Tank Removal Field Activities 10/7/1993	OCHCA 12/2/1996	Removal completed on 2/28/94. Site closed by OCHCA in a letter dated 12/2/96. No further action required.	2b
I-A	UST 83B	83	1500 Gallon Fuel Oil Tank	Tank Removal Field Activities 10/7/1993	OCHCA 12/2/1996	Removal completed on 2/28/94. Site closed by OCHCA in a letter dated 12/2/96. No further action required.	2b
I-A	UST 84A	84	1500 Gallon Diesel Tank	Site Assessment Report, Former UST 84A and 84B 7/27/1998  by OHM	RWQCB 2/1/2000	Tank has been removed. Site closed by RWQCB in a letter dated 2/1/00. No further action required.	2b
I-A	UST 84B	84	1500 Gallon Fuel Oil Tank	Site Assessment Report, Former UST 84A and 84B 7/27/1998  by OHM	RWQCB 2/1/2000	Tank has been removed. Site closed by RWQCB in a letter dated 2/1/00. No further action required.	2b
I-A	UST 94	94	1500 Gallon Fuel Oil Tank	Site Assessment Report, UST 94 8/1995  by Bechtel National	RWQCB 12/11/1995	Removal completed on 2/28/94. Site closed by RWQCB in a letter dated 12/11/95. No further action required.	2b
I-A	UST 146	146	1400 Gallon Fuel Oil Tank	Tank Removal Field Activities 8/22/1993	OCHCA 12/9/1996	Tank has been removed. Site closed by OCHCA in a letter dated 12/9/96. No further action required.	2b
I-A	UST 147	147	280 Gallon Diesel Tank	Information Package, Former UST Site 147 8/18/2003  by NAVFAC EFD Southwest	RWQCB 11/24/2003	Fuel tank for former booster pump for water supply system. Pump was located inside Building 147. Exploratory trenching in November 2002 identified a former tank excavation that had been filled with pea gravel. RWQCB concurred with NFA in a letter dated 11/24/03. No further action required.	2a

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 188	188	25000 Gallon Tank With Unknown Contents	Tank Removal Field Activities 9/13/1996	OCHCA 11/13/1996	SWMU/AOC 277. Tank has been removed. Tank was formerly within Tank Farm 3. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
I-A	UST 189	189	50000 Gallon Waste Oil Tank	Tank Removal Field Activities 9/13/1996	OCHCA 11/13/1996	SWMU/AOC 57. Tank has been removed. Tank was formerly within Tank Farm 3. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
I-A	UST 190	190	50000 Gallon Tank of Unknown Contents	Tank Removal Field Activities 9/13/1996	OCHCA 11/13/1996	SWMU/AOC 278. Tank has been removed. Tank was formerly within Tank Farm 3. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
I-A	UST 191	191	25000 Gallon Waste Oil Tank	Tank Removal Field Activities 9/13/1996	OCHCA 11/13/1996	SWMU/AOC 59. Tank has been removed. Tank was formerly within Tank Farm 3. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
I-A	UST 192	192	25000 Gallon Tank of Unknown Contents	Tank Removal Field Activities 9/13/1996	OCHCA 11/13/1996	Tank has been removed. Tank was formerly within Tank Farm 3. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
I-A	UST 193	193	50000 Gallon Tank of Unknown Contents	Tank Removal Field Activities 9/13/1996	OCHCA 11/13/1996	SWMU/AOC 279. Tank has been removed. Tank was formerly within Tank Farm 3. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
I-A	UST 194	194	50000 Gallon Tank of Unknown Contents	Tank Removal Field Activities 9/13/1996	OCHCA 11/13/1996	Tank has been removed. Tank was formerly within Tank Farm 3. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
I-A	UST 195	195	25000 Gallon Waste Fuel Tank	Tank Removal Field Activities 9/13/1996	OCHCA 11/13/1996	SWMU/AOC 280. Tank has been removed. Tank was formerly within Tank Farm 3. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
I-A	UST 219	219	50000 Gallon Tank of Unknown Contents	Tank Removal Field Activities 9/13/1996	OCHCA 11/13/1996	Tank has been removed. Tank was formerly within Tank Farm 3. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 220	220	25000 Gallon Tank of Unknown Contents	Tank Removal Field Activities 9/13/1996	OCHCA 11/13/1996	Tank has been removed. Tank was formerly within Tank Farm 3. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
I-A	UST 221	221	25000 Gallon Tank of Unknown Contents	Tank Removal Field Activities 9/13/1996	OCHCA 11/13/1996	Tank has been removed. Tank was formerly within Tank Farm 3. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
I-A	UST 252	252	1400 Gallon Diesel Tank	UST Removal Report, UST 252 1/30/1997  by Geofon	OCHCA 3/27/1997	SWMU/AOC 281. Removal completed on 12/31/96. Site closed by OCHCA in a letter dated 3/27/97. No further action required.	2b
I-A	UST 253	253	1400 Gallon Fuel Oil Tank	Site Assessment Report, Former UST Tank Site 253 12/4/1998  by OHM	RWQCB 3/31/2000	Tank has been removed. Site closed by RWQCB in a letter dated 3/31/2000. No further action required.	2b
I-A	UST 255	255	1400 Gallon Fuel Oil Tank	Site Assessment Report, Former UST Tank Site 255 12/8/1998  by OHM	RWQCB 3/31/2000	Tank has been removed. Site closed by RWQCB in a letter dated 3/31/2000. No further action required.	2b
I-A	UST 256	256	2000 Gallon Fuel Oil Tank	Site Assessment Report, UST Tank Site 256 12/12/1997  by OHM	RWQCB 1/7/1998	Tank has been removed. Site closed by RWQCB in a letter dated 1/7/98. No further action required.	2b
I-A	UST 257	257	1400 Gallon Fuel Oil Tank	UST Removal Report, UST 257 9/18/1997  by Geofon	OCHCA 10/24/1997	Removal completed on 7/1/97. Site closed by OCHCA in a letter dated 10/24/97. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 258	258	1400 Gallon Fuel Oil Tank	UST Removal Report, UST 258 9/18/1997  by Geofon	OCHCA 10/24/1997	Removal completed on 7/2/97. Site closed by OCHCA in a letter dated 10/24/97. No further action required.	2b
I-A	UST 260	260	2600 Gallon Fuel Oil Tank	Site Assessment Report, UST Site 260 2/24/1999  by NAVFAC EFD Southwest	RWQCB 8/31/2000	Removal completed by 10/19/94. Site closed by RWQCB in a letter dated 8/31/2000. No further action required.	2b
I-A	UST 262A	262	2600 Gallon Diesel Tank	Underground Storage Tank Removal Report, Tank Numbers 375, 262A, and 262B 4/16/1997	RWQCB 4/22/1997	Tank removed in 1990. Site closed by RWQCB in a letter dated 4/22/97. No further action required.	2b
I-A	UST 262B	262	2600 Gallon Diesel Tank	Underground Storage Tank Removal Report, Tank Numbers 375, 262A, and 262B 4/16/1997	RWQCB 4/22/1997	Tank removed in 1990. Site closed by RWQCB in a letter dated 4/22/97. No further action required.	2b
I-A	UST 263	263	3400 Gallon Diesel Tank	Site Assessment Report, Former UST Site 263 2/1996 by Bechtel National and Addendum, Site Assessment Report, Former UST Site 263 11/15/1996  by NAVFAC EFD Southwest	RWQCB 12/4/1996	Tank removed in 1993. Site closed by RWQCB in a letter dated 12/4/96. No further action required.	2b



Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 264	264	3400 Gallon Diesel Tank	Tank Removal Field Activities 5/13/1996 and 8/22/1996	OCHCA 12/19/1996	Tank removed in 1993. Site closed by OCHCA in a letter dated 12/19/96. No further action required.	2b
I-A	UST 265	265	1400 Gallon Diesel Tank	UST Removal Report, UST 265 1/30/1997 by Geofon	OCHCA 3/27/1997	Removal completed on 12/19/96. Site closed by OCHCA in a letter dated 3/27/97. No further action required.	2b
I-A	UST 266	266	1400 Gallon Fuel Oil Tank	UST Removal Report, UST 266 12/30/1997 by Geofon	OCHCA 3/27/1997	Removal completed on 12/19/96. Site closed by OCHCA in a letter dated 3/27/97. No further action required.	2b
I-A	UST 267	267	1400 Gallon Fuel Oil Tank	Tank Removal and Site Closure Report, UST 267 12/19/1997	OCHCA 2/27/1998	Removal completed on 12/19/96. Site closed by OCHCA in a letter dated 2/27/98. No further action required.	2b
I-A	UST 268	268	1400 Gallon Fuel Oil Tank	UST Removal Report, UST 268 9/12/1997 by Geofon	OCHCA 10/24/1997	Removal completed on 6/5/97. Site closed by OCHCA in a letter dated 10/24/97. No further action required.	2b
I-A	UST 269	269	1400 Gallon Fuel Oil Tank	UST Removal Report, UST 269 1/30/1997 by Geofon	OCHCA 3/27/1997	Removal completed on 12/19/96. Site closed by OCHCA in a letter dated 3/27/97. No further action required.	2b
I-A	UST 270	270	1400 Gallon Fuel Oil Tank	UST Removal Report, UST 270 9/18/1997 by Geofon	OCHCA 10/24/1997	Removal completed on 6/5/97. Site closed by OCHCA in a letter dated 10/24/97. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 271A	271	1500 Gallon Fuel Oil Tank	Tank Removal Field Activities 10/21/1993	OCHCA 12/2/1996	Removal completed on 2/28/94. Site closed by OCHCA in a letter dated 12/2/96. No further action required.	2b
I-A	UST 271B	271	1500 Gallon Fuel Oil Tank	Tank Removal Field Activities 10/21/1993	OCHCA 12/2/1996	Removal completed on 2/28/94. Site closed by OCHCA in a letter dated 12/2/96. No further action required.	2b
I-A	UST 271C	271	650 Gallon Fuel Oil Tank	Tank Removal Field Activities 10/21/1993	OCHCA 12/2/1996	Removal completed on 2/28/94. Site closed by OCHCA in a letter dated 12/2/96. No further action required.	2b
I-A	UST 271D	271	650 Gallon Fuel Oil Tank	Tank Removal Field Activities 10/21/1993	OCHCA 12/2/1996	Removal completed on 2/28/94. Site closed by OCHCA in a letter dated 12/2/96. No further action required.	2b
I-A	UST 272	272	1500 Gallon Fuel Oil Tank	Site Assessment Report, UST Site 272 2/1996 by Bechtel National  and Addendum Site Assessment Report, UST Site 272 4/24/1997 by NAVFAC EFD Southwest	RWQCB 5/14/1997	Removal completed on 2/28/94. Site closed by RWQCB in a letter dated 5/14/97. No further action required.	2b
I-A	UST 273	273	300 Gallon Fuel Oil Tank	Site Assessment Report, Former Underground Storage Tank Site 273 9/9/1996  by OHM	RWQCB 10/3/1996	Removal completed on 2/28/94. Site closed by RWQCB in a letter dated 10/13/96. No further action required.	2b
I-A	UST 274	274	1400 Gallon Fuel Oil Tank	UST Removal Report, UST 274 9/12/1997  by Geofon	OCHCA 10/24/1997	Removal completed on 5/26/97. Site closed by OCHCA in a letter dated 10/24/97. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 275	275	1500 Gallon Fuel Oil Tank	Site Assessment Report, UST 275 4/21/1999  by OHM	RWQCB 9/28/2000	Tank was closed in place. Site closed by RWQCB in a letter dated 9/28/2000. No further action required.	2b
I-A	UST 276	276	1500 Gallon Fuel Oil Tank	Site Assessment Report, Former UST Site 276 12/9/1996  by OHM	RWQCB 1/22/1997	Removal completed on 2/28/94. Site closed by RWQCB in a letter dated 1/22/97. No further action required.	2b
I-A	UST 277	277	1500 Gallon Fuel Oil Tank	Tank Removal Field Activities 10/15/1993	OCHCA 12/2/1996	Removal completed on 2/28/94. Site closed by OCHCA in a letter dated 12/2/96. No further action required.	2b
I-A	UST 278B	278	1400 Gallon Fuel Oil Tank	Tank Removal and Site Closure Report, UST 278B 7/2/1997  by OHM	OCHCA 7/11/1997	Removal completed on 4/17/97. Site closed by OCHCA in a letter dated 7/11/97. No further action required.	2b
I-A	UST 279	279	1500 Gallon Fuel Oil Tank	Tank Removal and Site Closure Report, UST 279 10/27/1997  by OHM	OCHCA 12/10/1997	Removal completed on 6/26/97. Site closed by OCHCA in a letter dated 12/10/97. No further action required.	2b
I-A	UST 280	280	2000 Gallon Diesel Tank	Site Assessment Report, Former UST Site 280 9/9/1996  by OHM	RWQCB 10/3/1996	Tank has been removed. Site closed by RWQCB in a letter dated 10/3/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 281	281	2000 Gallon Fuel Oil Tank	Tank Removal Field Activities 7/14/1997	OCHCA 10/24/1997	Removal completed on 7/10/97. Site closed by OCHCA in a letter dated 10/24/97. No further action required.	2b
I-A	UST 282	282	1400 Gallon Fuel Oil Tank	UST Removal Report, UST 282 9/15/1997  by Geofon	OCHCA 10/24/1997	Removal completed on 5/27/97. Site closed by OCHCA in a letter dated 10/24/97. No further action required.	2b
I-A	UST 283	283	1400 Gallon Fuel Oil Tank	UST Removal Report, UST 283 9/15/1997  by Geofon	OCHCA 10/24/1997	Removal completed on 5/22/97. Site closed by OCHCA in a letter dated 10/24/97. No further action required.	2b
I-A	UST 284	284	2000 Gallon Fuel Oil Tank	UST Removal Report, UST 284 9/15/1997  by Geofon	OCHCA 10/24/1997	Removal completed on 5/21/97. Site closed by OCHCA in a letter dated 10/24/97. No further action required.	2b
I-A	UST 285	285	2000 Gallon Fuel Oil Tank	UST Removal Report, UST 285 1/30/1997  by Geofon	RWQCB 4/21/1997	Removal completed on 12/19/96. Site closed by RWQCB in a letter dated 4/21/97. No further action required.	2b
I-A	UST 288	288	1500 Gallon Fuel Oil Tank	Tank Removal Field Activities 10/15/1993	OCHCA 12/2/1996	Removal completed on 2/28/94. Site closed by OCHCA in a letter dated 12/2/96. No further action required.	2b
I-A	UST 327	327	2600 Gallon Diesel Tank	Site Assessment Report, Former UST Site 327 8/16/1996  by OHM	RWQCB 10/3/1996	Tank has been removed. Site closed by RWQCB in a letter dated 10/3/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 328	328	2600 Gallon Diesel Tank	Site Assessment Report, Former UST Site 328 2/8/1998  by OHM	RWQCB 2/27/1998	Removal completed on 10/2/91. Site closed by RWQCB in a letter dated 2/27/98. No further action required.	2b
I-A	UST 329	329	3100 Gallon Diesel Tank	Tank Removal Field Activities 5/13/1993	OCHCA 12/9/1996	Tank removed in 1993. Site closed by OCHCA in a letter dated 12/9/96. No further action required.	2b
I-A	UST 337A	337	2600 Gallon Fuel Oil Tank	Site Assessment Report for Underground Storage Tank site 337A and 337B 5/15/1999  by NAVFAC EFD Southwest	RWQCB 4/14/1999	Removal completed on 7/3/97. Site closed by RWQCB in a letter dated 4/14/99. No further action required.	2b
I-A	UST 337B	337	2600 Gallon Fuel Oil Tank	Site Assessment Report for Underground Storage Tank site 337A and 337B 5/15/1999  by NAVFAC EFD Southwest	RWQCB 4/14/1999	Removal completed on 7/3/97. Site closed by RWQCB in a letter dated 4/14/99. No further action required.	2b
I-A	UST 347A	347	5000 Gallon Gasoline Tank	Tank Removal Field Activities 1/18/1994	OCHCA 12/19/1996	Tank removed in 1993. Site closed by OCHCA in a letter dated 12/19/96. No further action required.	2b
I-A	UST 347B	347	7500 Gallon Gasoline Tank	Tank Removal Field Activities 1/18/1994	OCHCA 12/19/1996	Tank removed in 1993. Site closed by OCHCA in a letter dated 12/19/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 347C	347	10000 Gallon Gasoline Tank	Tank Removal Field Activities 1/18/1994	OCHCA 12/19/1996	Tank removed in 1993. Site closed by OCHCA in a letter dated 12/19/96. No further action required.	2b
I-A	UST 347D	347	300 Gallon Waste Oil Tank	Tank Removal Field Activities 1/18/1994	OCHCA 12/19/1996	SWMU/AOC 284. Tank removed in 1993. Site closed by OCHCA in a letter dated 12/19/96. No further action required.	2b
I-A	UST 365	365	2500 Gallon Diesel Tank	Site Assessment Report, Former UST Site 365 6/17/1998  by OHM	RWQCB 4/12/1999	Tank has been removed. Site closed by RWQCB in a letter dated 4/12/99. No further action required.	2b
I-A	UST 366	366	2500 Gallon Diesel Tank	Site Assessment Report, UST 366 12/1995  by Bechtel National	RWQCB 3/12/1996	Abandonment completed on 2/28/94. Site closed by RWQCB in a letter dated 3/12/96. No further action required.	2b
I-A	UST 418	418	550 Gallon Fuel Oil Tank	UST Removal Report, UST 418 9/29/1997  by Geofon	OCHCA 11/14/1997	Removal completed on 7/23/97. Site closed by OCHCA in a letter dated 11/14/97. No further action required.	2b
I-A	UST 449	449	3000 Gallon Fuel Oil Tank	Site Assessment Report, UST 449 8/1995 by  Bechtel  National	RWQCB 12/11/1995	Removal completed 2/28/94. Site closed by RWQCB in a letter dated 12/11/95. No further action required.	2b
I-A	UST 450	450	3000 Gallon Diesel Tank	Tank Removal Field Activities  6/17/1993 & 10/25/1996	OCHCA 12/9/1996	Tank removed in 1993. Site closed by OCHCA in a letter dated 12/9/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 451	451	3000 Gallon Diesel Tank	Site Assessment Report, UST 451 11/1995  by Bechtel National	RWQCB 3/12/1996	Removal completed 2/28/94. Site closed by RWQCB in a letter dated 3/12/96. No further action required.	2b
I-A	UST 452	452	3000 Gallon Diesel Tank	Tank Removal Field Activities 6/17/1993 & 10/25/1996	OCHCA 12/9/1996	Tank removed in 1993. Site closed by OCHCA in a letter dated 12/9/96. No further action required.	2b
I-A	UST 625	625	1500 Gallon Waste Oil Tank	Closure Report, Removal & Remediation of UST 625 6/28/1996  by OHM	RWQCB 8/13/1996	SWMU/AOC 156. Tank has been removed. Site closed by RWQCB in a letter dated 8/13/96. No further action required.	4
I-A	UST 662	662	10000 Gallon Fuel Oil Tank	Tank Removal Field Activities 8/3/1993	OCHCA 12/9/1996	Tank removed in 1993. Site closed by OCHCA in a letter dated 12/9/96. No further action required.	2b
I-A	UST 730	730	1000 Gallon Diesel Tank	UST Removal Report, UST 730 6/12/2000  by Geofon	OCHCA 7/28/2000	Removal completed on 1/25/00. No evidence of a release was identified. Site closed by OCHCA in a letter dated 7/28/00. No further action required.	1
I-A	UST 733A	733	10000 Gallon Diesel Tank	Tank Removal Field Activities, Tank 733A, B, & C 10/15/1993	OCHCA 12/9/1996	Tank removed in 1993. Site closed by OCHCA in a letter dated 12/9/96. No further action required.	2b
I-A	UST 733B	733	10000 Gallon Diesel Tank	Tank Removal Field Activities, Tank 733A, B, & C 10/15/1993	OCHCA 12/9/1996	SWMU/AOC 286. Tank removed in 1993. Site closed by OCHCA in a letter dated 12/9/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	UST 733C	733	10000 Gallon Diesel Tank	Tank Removal Field Activities, Tank 733A, B, & C 10/15/1993	OCHCA 12/9/1996	SWMU/AO 287. Tank removed in 1993. Site closed by OCHCA in a letter dated 12/9/96. No further action required.	2b
I-A	UST 733D	733	10000 Gallon Diesel Tank	Tank Removal and Site Closure Report, UST 733D 6/12/1997  by OHM	OCHCA 7/11/1997	Removal completed on 3/21/97. Site closed by OCHCA in a letter dated 7/11/97. No further action required.	2b
I-A	UST 766B	766	500 Gallon Waste Oil Tank	UST and OWS Removal Report, UST 766B and OWS 766A 1/21/1999  by Geofon	OCHCA 4/26/1999	SWMU/AOC 221. Tank has been removed. Site closed by OCHCA in a letter dated 4/26/99. No further action required.	4
I-A	UST 797	797	10000 Gallon Aviation Gasoline Tank	UST Removal Report, UST 797 1/21/1999  by Geofon	OCHCA 4/20/1999	Tank has been removed. Site closed by OCHCA in a letter dated 4/20/99. No further action required.	2b
I-A	UST 5102	5102	500 Gallon Fuel Oil Tank	UST Removal Report, UST 5102 6/12/2000  by Geofon	OCHCA 7/26/2000	Removal completed on 1/25/00. Site closed by OCHCA in a letter dated 7/26/00. No further action required.	2b



Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
<b>Navy Sale Parcel II</b>							
<b>Aboveground Storage Tanks</b>							
II-A	AST 464	464	500 Gallon Propane Tank	Summary Report, Former AST Site 464 7/14/1999 by NAVFAC EFD Southwest	RWQCB 8/22/2000	Horizontal tank; associated with golf course; Tank is still active. No releases have been identified. No further action required. NFA decision date of 22 August 2000. No further action required.	1
II-A	AST 610	610	300 Gallon Diesel Tank	Summary Report, former AST 610 8/1/2000 by NAVFAC EFD Southwest	RWQCB 8/23/2000	Tank has been removed. Horizontal tank; tank formerly situated on south side of Building 610; no further action required; NFA decision date of 23 August 2000. No further action required.	2a
II-A	AST 619	619	1500 Gallon Diesel Tank	Summary Report, Former Aboveground Storage Tank Site 619 7/24/2000 by NAVFAC EFD Southwest	RWQCB 8/31/2000	Tank has been removed. Horizontal tank; no further action required; NFA decision date of 31 August 2000. No further action required.	2a
II-A	AST 883	883	1000 Gallon Waste oil Tank	Summary Report, Former Aboveground Storage Tank Site 883 10/14/1999 by NAVFAC EFD Southwest	RWQCB 8/22/2000	Tank was situated on the south side of Building 883; Tank has been removed. Rectangular yellow tank; no releases identified; No further action required; NFA decision date of 22 August 2000. No further action required.	1

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
<b>Underground Storage Tanks</b>							
II-A	UST 138	138	1000 Gallon Diesel Tank	Tank Removal and Site Closure Report for UST 138 12/30/1997  by OHM	OCHCA 2/27/1998	Removal completed on 11/21/97. Site closed by OCHCA in a letter dated 2/27/98. No further action required.	2b
II-A	UST 196	196	25000 Gallon Diesel Tank	Tank Removal Field Activities  8/2/1996 to 8/31/1996	OCHCA 11/13/1996	Tank was formerly within Tank Farm 4. Tank has been removed. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
II-A	UST 197	197	50000 Gallon Diesel Tank	Tank Removal Field Activities  8/2/1996 to 8/31/1996	OCHCA 11/13/1996	Tank was formerly within Tank Farm 4. Tank has been removed. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
II-A	UST 198	198	50000 Gallon JP-5 Tank	Tank Removal Field Activities  8/2/1996 to 8/31/1996	OCHCA 11/13/1996	Tank has been removed. Tank was formerly within Tank Farm 4. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
II-A	UST 199	199	25000 Gallon JP-5 Tank	Tank Removal Field Activities  8/2/1996 to 8/31/1996	OCHCA 11/13/1996	Tank was formerly within Tank Farm 4. Tank has been removed. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
II-A	UST 200	200	25000 Gallon JP-5 Tank	Tank Removal Field Activities  8/2/1996 to 8/31/1996	OCHCA 11/13/1996	Tank was formerly within Tank Farm 4. Tank has been removed. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
II-A	UST 201	201	50000 Gallon JP-4 Tank	Tank Removal Field Activities  8/2/1996 to 8/31/1996	OCHCA 11/13/1996	Tank was formerly within Tank Farm 4. Tank has been removed. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	UST 202	202	50000 Gallon JP-4 Tank	Tank Removal Field Activities 8/2/1996 to 8/31/1996	OCHCA 11/13/1996	Tank was formerly within Tank Farm 4. Tank has been removed. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
II-A	UST 203	203	25000 Gallon JP-4 Tank	Tank Removal Field Activities 8/2/1996 to 8/31/1996	OCHCA 11/13/1996	Tank was formerly within Tank Farm 4. Tank has been removed. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
II-A	UST 216	216	50000 Gallon Diesel Tank	Tank Removal Field Activities 8/2/1996 to 8/31/1996	OCHCA 11/13/1996	Tank was formerly within Tank Farm 4. Tank has been removed. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
II-A	UST 217	217	25000 Gallon Diesel Tank	Tank Removal Field Activities 8/2/1996 to 8/31/1996	OCHCA 11/13/1996	Tank was formerly within Tank Farm 4. Tank has been removed. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
II-A	UST 218	218	25000 Gallon Diesel Tank	Tank Removal Field Activities 8/2/1996 to 8/31/1996	OCHCA 11/13/1996	Tank was formerly within Tank Farm 4. Tank has been removed. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
II-A	UST 292	292	1400 Gallon Diesel Tank	UST Removal Report, UST 292 2/14/1997  by Geofon	OCHCA 3/27/1997	Removal completed on 12/19/96. Site closed by OCHCA in a letter dated 3/27/97. No further action required.	2b
II-A	UST 404	404	1000 Gallon Diesel Tank	UST Removal Report, UST 404 12/22/1998  by Geofon	OCHCA 4/20/1999 RWQCB 9/6/2000	Tank has been removed. Site closed by OCHCA in a letter dated 4/20/99. RWQCB concurred in a letter dated 9/6/00. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	UST 405	405	1200 Gallon Diesel Tank	Site Assessment Report, Former UST Site 405 11/22/1996  by OHM	RWQCB 12/16/1996	Tank removed in 1993. Site closed by RWQCB in a letter dated 12/16/96. No further action required.	2b
II-A	UST 406	406	1200 Gallon Diesel Tank	Site Assessment Report, Former UST Site 406 11/27/1996  by OHM	RWQCB 12/16/1996	Tank removed in 1993. Site closed by RWQCB in a letter dated 12/16/96. No further action required.	2b
II-A	UST 453	453	1500 Gallon Diesel Tank	Tank Removal and Site Closure Report, UST 453 7/25/1997  by OHM	OCHCA 9/5/1997	Removal completed 5/16/97. Site closed by OCHCA in a letter dated 9/5/97. No further action required.	2b
II-A	UST 454	454	1500 Gallon Diesel Tank	Tank Removal and Site Closure Report, UST 454 7/29/1997  by OHM	OCHCA 9/5/1997	Removal completed 5/27/97. Site closed by OCHCA in a letter dated 9/5/97. No further action required.	2b
II-A	UST 455	455	1500 Gallon Diesel Tank	Technical Memorandum, Former Underground Storage Tank Sites 114A, 295, 296, 435, 455, 605A, and 606A 3/21/1997  by NAVFAC EFD Southwest	RWQCB 4/11/1997	Removal completed 10/17/91. Site closed by RWQCB in a letter dated 4/11/97. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	UST 461	461	550 Gallon Diesel Tank	Site Assessment Report, Former UST Site 461 12/12/1998  by OHM	RWQCB 8/31/2000	SWMU/AOC 137. Tank removed in 1993. Site closed by RWQCB in a letter dated 8/31/2000. No further action required.	2b
II-A	UST 461B	461	1500 Gallon Waste Oil Tank	Technical Memorandum - Tank Closure Report, UST 461B 8/20/1999  by OHM	OCHCA 9/27/1999	Tank closed in place. Site closed by OCHCA in a letter dated 9/27/99. No further action required.	4
II-A	UST 462	462	550 Gallon Diesel Tank	Site Assessment Report, Former UST Site 462 12/29/1998  by OHM	RWQCB 8/31/2000	SWMU/AOC 139. Tank removed in 1993. Site closed by RWQCB in a letter dated 8/31/2000. No further action required.	2b
II-A	UST 462B	462	1500 Gallon Waste Oil Tank	Technical Memorandum - Tank Closure Report, UST 462B 8/20/1999  by OHM	OCHCA 9/27/1999	Tank closed in place. Site closed by OCHCA in a letter dated 9/27/99. No further action required.	4
II-A	UST 463	463	1500 Gallon Diesel Tank	Site Assessment Report, Former UST Tank Site 463 12/6/1996  by OHM	RWQCB 1/22/1997	Tank removed in 1993. Site closed by RWQCB in a letter dated 1/22/97. No further action required.	4
II-A	UST 579	579	320 Gallon Fuel Oil Tank	Tank Removal Field Activities 5/27/1993	OCHCA 12/9/1996	Tank removed in 1993. Site closed by OCHCA in a letter dated 12/9/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	UST 581	581	550 Gallon Diesel Tank	Tank Removal Field Activities 6/3/1993	OCHCA 12/9/1996	Tank removed in 1993. Site closed by OCHCA in a letter dated 12/9/96. No further action required.	2b
II-A	UST 610	610	300 Gallon Gasoline Tank	Tank Removal Field Activities 9/7/1993	OCHCA 12/9/1996	Tank removed in 1993. Site closed by OCHCA in a letter dated 12/9/96. No further action required.	2b
II-A	UST 627	627	700 Gallon Diesel Tank	Closure Report, Removal & Remediation of UST 627 4/29/1997  by OHM	OCHCA 7/21/1997	Removal completed on 12/31/96. Site closed by OCHCA in a letter dated 7/21/97. No further action required.	2b
II-A	UST 636	636	1500 Gallon Diesel Tank	Tank Removal Field Activities 11/18/1996	OCHCA 3/27/1997	Removal completed on 12/19/96. Site closed by OCHCA in a letter dated 3/27/97. No further action required.	2b
II-A	UST 706	706	100 Gallon Diesel Tank	Site Assessment Report, Former UST Site 706 6/17/1998  by OHM	RWQCB 4/12/1999	SWMU/AOC 191. Building demolished. Tank has been removed. Site closed by RWQCB in a letter dated 4/12/99. No further action required.	2b
II-A	UST 762B	762	185 Gallon Waste Oil Tank	Closure Report, Removal and Site Closure of UST 762B and OWS 762A 5/28/1997  by OHM	OCHCA 7/2/1997	SWMU/AOC 209. Removal completed on 1/22/97. Site closed by OCHCA in a letter dated 7/2/97. No further action required.	4
II-A	UST 782	782	1000 Gallon Gasoline Tank	UST Removal Report, UST 782 7/23/1997  by Geofon	OCHCA 10/24/1997	Removal completed on 7/23/97. Site closed by OCHCA in a letter dated 10/24/97. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	UST 5201	5201	300 Gallon Fuel Oil Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5202	5202	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5203	5203	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5204	5204	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5205	5205	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5206	5206	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5207	5207	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	UST 5208	5208	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area  8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5209	5209	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area  8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5210	5210	300 Gallon Diesel Tank	Site Investigation and Remedial Investigation Activities at Former Barracks Location (Building 7750)  10/23/1990 & 11/19/1990	OCHCA 2/28/1996	Tank removed in 1990. Site closed by OCHCA in a letter dated 2/28/96. No further action required.	2b
II-A	UST 5211	5211	300 Gallon Diesel Tank	Site Investigation and Remedial Investigation Activities at Former Barracks Location (Building 7750)  10/23/1990 & 11/19/1990	OCHCA 2/28/1996	Tank removed in 1990. Site closed by OCHCA in a letter dated 2/28/96. No further action required.	2b
II-A	UST 5212	5212	300 Gallon Diesel Tank	Site Investigation and Remedial Investigation Activities at Former Barracks Location (Building 7750)  10/23/1990 & 11/19/1990	OCHCA 2/28/1996	Tank removed in 1990. Site closed by OCHCA in a letter dated 2/28/96. No further action required.	2b



Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	UST 5213	5213	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5214	5214	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5215	5215	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5216	5216	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5217	5217	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5218	5218	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5219	5219	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	UST 5220	5220	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 3/27/1991	OCHCA 2/23/1996	Tank has been removed. Site closed by OCHCA in a letter dated 2/23/96. No further action required.	2b
II-A	UST 5221	5221	300 Gallon Diesel Tank	Site Investigation and Remedial Investigation Activities at Former Barracks Location (Building 7750) 10/23/1990 & 11/19/1990	OCHCA 2/28/1996	Tank removed in 1990. Site closed by OCHCA in a letter dated 2/28/96. No further action required.	2b
II-A	UST 5222	5222	300 Gallon Diesel Tank	Site Investigation and Remedial Investigation Activities at Former Barracks Location (Building 7750) 10/23/1990 & 11/19/1990	OCHCA 2/28/1996	Tank removed in 1990. Site closed by OCHCA in a letter dated 2/28/96. No further action required.	2b
II-A	UST 5223	5223	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 2/23/1996	Tank has been removed. Site closed by OCHCA in a letter dated 2/23/96. No further action required.	2b
II-A	UST 5224	5224	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5225	5225	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	UST 5226	5226	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5227	5227	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5228	5228	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5229	5229	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5230	5230	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5231	5231	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5232	5232	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	UST 5233	5233	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5234	5234	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5235	5235	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5236	5236	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5237	5237	300 Gallon Diesel Tank	Site Investigation and Remedial Investigation Activities at Former Barracks Location (Building 7750) 10/23/1990 & 11/19/1990	OCHCA 2/28/1996	Tank removed in 1990. Site closed by OCHCA in a letter dated 2/28/96. No further action required.	2b
II-A	UST 5238	5238	300 Gallon Diesel Tank	Site Investigation and Remedial Investigation Activities at Former Barracks Location (Building 7750) 10/23/1990 & 11/19/1990	OCHCA 2/28/1996	Tank removed in 1990. Site closed by OCHCA in a letter dated 2/28/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	UST 5239	5239	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5240	5240	300 Gallon Diesel Tank	Site Investigation and Remedial Investigation Activities at Former Barracks Location (Building 7750) 10/23/1990 & 11/19/1990	OCHCA 2/28/1996	Tank removed in 1990. Site closed by OCHCA in a letter dated 2/28/96. No further action required.	2b
II-A	UST 5241	5241	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST 5242	5242	300 Gallon Diesel Tank	Tank Removal Field Activities, Namar Housing Area 8/1/1995 to 8/31/1995	OCHCA 3/1/1996	Removal completed on 9/15/95. Site closed by OCHCA in a letter dated 3/1/96. No further action required.	2b
II-A	UST T-2	T-2	2000 Gallon Waste JP-5 Tank	Tank Removal Field Activities 8/1/1996	OCHCA 11/13/1996	SWMU/AOC 18. Associated with Tank Farm #4. Tank has been removed. Site closed by OCHCA in a letter dated 11/13/96. No further action required.	2b
II-A	UST T-3	T-3	2000 Gallon Waste JP-5 Tank	Tank Removal Field Activities 8/2/1996 to 8/31/1996	OCHCA 11/13/1996	SWMU/AOC 19. Tank has been removed. Site closed by OCHCA in a letter dated 11/13/96. Associated with Tank Farm #4. No further action required.	2b
II-A	UST T-10	T-10	1000 Gallon JP-5 Tank	Tank Removal and Site Closure Report, UST T-10 6/13/1997 by OHM	OCHCA 7/11/1997	SWMU/AOC 108. Removal completed on 3/5/97. Site closed by OCHCA in a letter dated 7/11/97. Associated with Tank Farm #4. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
<b>Navy Sale Parcel III</b>							
<b>Underground Storage Tanks</b>							
III-A	UST 24	24	500 Gallon Diesel Tank	Site Assessment Report, Former UST Site 24 10/14/1996  by OHM	RWQCB 12/9/1996	Tank has been removed. Site closed by RWQCB in a letter dated 12/9/96. No further action required.	2b
III-A	UST 38	38	1500 Gallon Fuel Oil Tank	Tank Removal and Site Closure Report, Tank Site 38 11/7/1997  by OHM	RWQCB 11/21/1997	Removal completed on 6/13/97. Site closed by RWQCB in a letter dated 11/21/97. No further action required.	2b
III-A	UST 39	39	500 Gallon Heating Oil Tank	Removal and Disposal of Piping and Field Sampling in Pipe Trench and Former Excavation 6/2/2003  by Geofon	RWQCB 8/14/2003	Site was investigated by exploratory drilling in November 2002. UST was not found. The UST was previously removed, although no record of a removal action has been identified. 120 linear feet of piping utilized for the UST was excavated and removed in March 2003. Site closed by RWQCB in a letter dated 8/14/2003. No further action required.	2b
III-A	UST 40	40	500 Gallon Diesel Tank	Closure Report/Final Report, Tank 40 1/22/1992  by JTL	OCHCA 11/7/1996	Removal completed on 2/6/92. Site closed by OCHCA in a letter dated 11/7/96. No further action required.	2b
III-A	UST 41	41	500 Gallon Diesel Tank	Closure Report/Final Report, Tank 41 1/22/1992  by JTL	OCHCA 11/7/1996	Removal completed on 2/6/92. Site closed by OCHCA in a letter dated 11/7/96. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
III-A	UST 42	42	500 Gallon Fuel Oil Tank	Closure Report/Final Report, Tank 42 1/22/1992  by JTL	OCHCA 11/7/1996	Removal completed on 2/6/92. Site closed by OCHCA in a letter dated 11/7/96. No further action required.	2b
III-A	UST 43	43	500 Gallon Fuel Oil Tank	Site Assessment Report, UST 43 8/1995  by Bechtel National	RWQCB 12/11/1995	Removal completed on 2/6/92. Site closed by RWQCB in a letter dated 12/11/95. No further action required.	2b
III-A	UST 241	241	850 Gallon Diesel Tank	Site Assessment Report, Former UST Tank Sites 33, 35, 105A, 241  by OHM	RWQCB 10/30/1996	Removal completed on 5/20/93. Site closed by RWQCB in a letter dated 10/30/96. No further action required.	2b
III-A	UST 251	251	2000 Gallon Fuel Oil Tank	Site Assessment Report, Former UST Tank Site 251 6/12/1998  by OHM	RWQCB 4/12/1999	Tank removed in 1997. Site closed by RWQCB in a letter dated 4/12/99. No further action required.	2b

Table 7: AST/UST Sites

Transfer Parcel	Tank ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
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Notes: Some tanks were given a SWMU identifier during the RFA, although these designations may not have been appropriate for some LOCs. For sites that received NFA concurrence after the September 2003 Final EBS (Earth Tech 2003), additional site-specific information is provided. Sites noted with a SWMU/AOC designation were originally identified during the RFA and were subsequently categorized as a UST LOC.

All AST/UST sites listed in Table 7 are previously-identified LOCs and the following apply to each site:

- No further action is required as per Regulatory Agency Concurrence Letter (date listed) based on Closure Report (date listed).
- The allowable use is residential as long as the applicable notifications and restrictions outlined in Section 5 of this FOST are adhered to.
- No engineering controls, institutional controls, or restrictions are required for any of the LOCs. Relevant notifications and restrictions for buildings/structures/facilities associated with LOCs are summarized in Table 16a/b.
- Operation and Maintenance requirements are not applicable.
- Public outreach activities were effected through the public comment period for the FOST (April 28 to May 28, 2003 and May 3 to June 17, 2004) and Restoration Advisory Board meetings. Pertinent information can be found at <http://www.efds.w.navy.mil/environmental/envhome.htm>.

Source: Earth Tech 2003.

AOC	=	Area of Concern
AST	=	Aboveground Storage Tank
DTSC	=	California Department of Toxic Substances Control
EBS	=	Environmental Baseline Survey
ECP	=	Environmental Condition of Property
FOST	=	Finding of Suitability to Transfer
ID	=	Identification
JP-5	=	Jet Propulsion Fuel, Grade 5
LOC	=	Location of Concern
NAVFAC EFD Southwest	=	Southwest Division Naval Facilities Engineering Command, San Diego
NFA	=	No Further Action
OCHCA	=	Orange County Health Care Agency
RFA	=	RCRA Facility Assessment
RWQCB	=	Regional Water Quality Control Board
SWMU	=	Solid Waste Management Unit
Unk	=	Unknown
UST	=	Underground Storage Tank
VSI	=	Visual Site Inspection



Table 8: Oil/Water Separators

Transfer Parcel	OWS ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
<b>Navy Sale Parcel I</b>							
I-A	OWS 280A	280	200 Gallon Oil/Water Separator	Tank Removal and Site Closure Report, OWS 280A 6/20/1997  by OHM	OCHCA 7/11/1997	OWS installation date is unknown; OWS removed in 1997. OWS was not associated with a UST. Site was investigated, and no significant soil contamination identified at site. RFA recommended no further action. Site closed by OCHCA in a letter dated 7/11/97. No further action required.	3
I-A	OWS 626-1	626	600 Gallon Oil/Water Separator	Site Assessment Report, former OWS 626-1, 626-2, and 626-3 1/20/1999  by NAVFAC EFD Southwest	RWQCB 9/28/2000	Site also identified as SWMU/AOC 159. OWS installed in 1967. OWS has been removed. OWS was not associated with a UST. Site is within the boundaries of IRP Site 12; however, OWS not addressed under IRP. Staining noted at the OWS. All required response actions have been completed. Site closed by RWQCB in a letter dated 9/28/00. No further action required.	4
I-A	OWS 626-2	626	560 Gallon Oil/Water Separator	Site Assessment Report, former OWS 626-1, 626-2, and 626-3 1/20/1999  by NAVFAC EFD Southwest	RWQCB 9/28/2000	OWS installation date is unknown. OWS has been removed. OWS was not associated with a UST. No releases identified; OWS appeared sound. Site closed by RWQCB in a letter dated 9/28/00. No further action required.	1
I-A	OWS 626-3	626	835 Gallon Oil/Water Separator	Site Assessment Report, former OWS 626-1, 626-2, and 626-3 1/20/1999  by NAVFAC EFD Southwest	RWQCB 9/28/2000	OWS installation date is unknown. OWS has been removed. OWS was not associated with a UST. No releases identified; OWS appeared sound. Site closed by RWQCB in a letter dated 9/28/00. No further action required.	1

Table 8: Oil/Water Separators

Transfer Parcel	OWS ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	OWS 626-4	626	560 Gallon Oil/Water Separator	Site Assessment Report, OWS 626-4 & 626-5 3/24/1999  by NAVFAC EFD Southwest	RWQCB 9/28/2000	OWS installation date is unknown. OWS closed in place. OWS was not associated with a UST. OWS appeared sound. Site closed by RWQCB in a letter dated 9/28/00. No further action required.	1
I-A	OWS 626-5	626	560 Gallon Oil/Water Separator	Site Assessment Report, OWS 626-4 & 626-5 3/24/1999  by NAVFAC EFD Southwest	RWQCB 9/28/2000	OWS installation date is unknown. OWS closed in place. OWS was not associated with a UST. OWS appeared sound. Site closed by RWQCB in a letter dated 9/28/00. No further action required.	1
I-A	OWS 744	744	500 Gallon Oil/Water Separator	Site Assessment Report, OWS 744 7/16/1999  by OHM	RWQCB 9/28/00	OWS installation date unknown; OWS was closed in place. OWS was not associated with a UST. Site closed by RWQCB in a letter dated 9/28/00. No further action required.	3
I-A	OWS 766A	766	100 Gallon Oil/Water Separator	UST and OWS Removal Report, UST 766B & OWS 766A 1/21/1999  by Geofon	OCHCA 4/26/1999	Site also identified as SWMU/AOC 220. OWS was installed in 1982. OWS was associated with UST 766A. OWS was closed in place. Site was investigated and NFA was recommended by the RFA based on soil sample results. Site closed by OCHCA in a letter dated 4/26/99. No further action required.	3
I-A	OWS 896	896	550 Gallon Oil/Water Separator	Site Assessment Report, OWS Site 896 7/23/1999  by OHM	RWQCB 9/28/2000	OWS installed in 1982; OWS closed in place. Unknown if UST was associated with this OWS. Site was investigated. Site closed by RWQCB in a letter dated 9/28/00. No further action required.	3

Table 8: Oil/Water Separators

Transfer Parcel	OWS ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	OWS 1702	1702	550 Gallon Oil/Water Separator	Site Assessment Report, OWS Site 1702 6/18/1999 by OHM	RWQCB 9/28/2000	OWS installation date unknown; OWS closed in place. Unknown if UST was associated with this OWS. Site was investigated and no releases were identified. Site closed by RWQCB in a letter dated 9/28/00. No further action required.	1
<b>Navy Sale Parcel II</b>							
II-A	OWS 371	371	2350 Gallon Oil/Water Separator	Site Assessment Report, OWS 371 6/29/1999 by OHM	RWQCB 9/28/2000	OWS installation date is unknown. OWS has been removed. OWS was not associated with a UST. Site closed by RWQCB in a letter dated 9/28/00. No further action required.	3
II-A	OWS 461A	461	50 Gallon Oil/Water Separator	Site Assessment Report, OWS Site 461A 8/17/1999 by OHM	OCHCA 9/27/1999 RWQCB 9/28/2000	Site also identified as SWMU/AOC 137. OWS installation date is unknown. OWS was closed in place. Site was investigated, and no significant soil contamination was identified at this site. Site closed by OCHCA in a letter dated 9/27/1999 and RWQCB in a letter dated 9/28/00. No further action required.	3
II-A	OWS 462A	462	50 Gallon Oil/Water Separator	Site Assessment Report, OWS 462A 8/18/1999 by OHM	OCHCA 9/27/1999 RWQCB 7/7/2000	Site also identified as SWMU/AOC 139. OWS installation date is unknown. OWS was closed in place. OWS was associated with UST 462B. Site was investigated, and no significant soil contamination was identified at this site. Site closed by OCHCA in a letter dated 9/27/99. No further action required.	3
II-A	OWS 762A	762	100 Gallon Oil/Water Separator	Closure Report, Removal and Site Closure of UST 762B and OWS 762A 5/28/1997 by OHM	OCHCA 7/2/1997	Site also identified as SWMU/AOC 208. OWS was installed in 1982. OWS was removed in 1997. OWS was associated with UST 762B. Site was investigated and recommended for NFA. Site closed by OCHCA in a letter dated 7/2/97. No further action required.	3

Table 8: Oil/Water Separators

Transfer Parcel	OWS ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	OWS 817	817	1500 Gallon Oil/Water Separator	Site Assessment Report, OWS Site 817 4/29/1999  by NAVFAC EFD Southwest	RWQCB 9/28/2000	Site also identified as SWMU/AOC 233. OWS installation date is unknown. OWS closed in place. OWS was not associated with a UST. Site was investigated and NFA was recommended in the RFA based on soil sample results. Site closed by RWQCB in a letter dated 9/28/00. No further action required.	3
II-A	OWS 845	845	1900 Gallon Oil/Water Separator	Site Assessment Report, OWS 845  8/21/2003	DTSC 3/23/2004	Site also identified as SWMU/AOC 248/249. OWS was not associated with a UST. Installation date unknown. OWS closed in place in 1999 and soil samples collected. Additional sampling to fill data gaps was conducted in May 2003. Based on risk screening results, DTSC concurred with NFA in a letter dated 3/23/2004. No further action required.	3

Table 8: Oil/Water Separators

Transfer Parcel	OWS ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
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Notes: Sites noted with a SWMU/AOC designation were originally identified during the RFA and were subsequently categorized as an OWS LOC.

All OWSs listed in Table 8 are previously-identified LOCs and the following apply to each site:

- No further action is required as per Regulatory Agency Concurrence Letter (date listed) based on Closure Report (date listed).
- The allowable use is residential as long as the applicable notifications and restrictions outlined in Section 5 of this FOST are adhered to.
- No engineering controls, institutional controls, or restrictions are required for any of the LOCs. Relevant notifications and restrictions for buildings/structures/facilities associated with LOCs are summarized in Table 16a/b.
- Operation and Maintenance requirements are not applicable.
- Public outreach activities were effected through the public comment period for the FOST (April 28 to May 28, 2003 and May 3 to June 17, 2004) and Restoration Advisory Board meetings. Pertinent information can be found at <http://www.efds.w.navfac.navy.mil/environmental/envhome.htm>.

Source: Earth Tech 2003.

AOC	=	Areas of Concern
DTSC	=	California Department of Toxic Substances Control
ECP	=	Environmental Condition of Property
FOST	=	Finding of Suitability to Transfer
ID	=	Identification
IRP	=	Installation Restoration Program
LOC	=	Location of Concern
NAVFAC EFD Southwest	=	Southwest Division Naval Facilities Engineering Command, San Diego
NFA	=	No Further Action
OCHCA	=	Orange County Health Care Agency
OWS	=	Oil/Water Separator
RFA	=	RCRA Facility Assessment
RWQCB	=	Regional Water Quality Control Board
SWMU	=	Solid Waste Management Unit
UST	=	Underground Storage Tank

Table 9: Wash Racks

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
<b>Navy Sale Parcel I</b>							
I-A	RFA 157	626	Vehicle Wash Rack	Site Verification at Former Vehicle Washrack at the Hobby Shop, SWMU Number 157, Petroleum Corrective Action Program 11/19/1999	RWQCB 3/31/2000	Inactive vehicle wash rack. Site was identified in the RFA and has been investigated. Further action was required; the site was addressed as part of compliance program. The site lies within the boundaries of IRP Site 20, but was not to be addressed under the IRP. Fieldwork was completed in 1998. RWQCB is regulatory agency lead; agency concurred with NFA recommendation in a letter dated 3/31/00. No further action required.	2b
I-A	RFA 219	766	Vehicle Wash Rack	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Inactive vehicle wash rack. OWS 766A is associated with this wash rack. NFA status identified in Final RFA Report (JEG 1993) and DTSC concurred in a letter dated 7/23/96. No further action required.	1
<b>Navy Sale Parcel II</b>							
II-S	RFA 136	461	Aircraft Wash Area	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Aircraft wash area situated on tarmac. Site is inactive. OWS 461A is associated with this wash rack. NFA status identified in Final RFA Report (JEG 1993) and DTSC concurred with NFA recommendation in a letter dated 7/23/96. No further action required.	1

Table 9: Wash Racks

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-S	RFA 141	845	Aircraft Wash Area	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Aircraft wash area. Site is inactive. OWS 845 is associated with this wash rack, and both are associated with Building 463. NFA status identified in Final RFA Report (JEG 1993) and DTSC concurred in a letter dated 7/23/96. No further action required.	1
II-A	RFA 270	817	Vehicle Wash Rack	Final RCRA Facility Assessment (RFA) Report 7/1993 by Jacobs Engineering Group and Final Addendum to RFA Report 5/1996 by Bechtel National	DTSC 7/23/1996	Inactive vehicle wash rack. NFA status identified in Final RFA Report (JEG 1993) and DTSC concurred in a letter dated 7/23/96. No further action required.	2b

Table 9: Wash Racks

Transfer Parcel	RFA ID	Building No./ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
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Note: All wash racks listed in Table 9 are previously-identified LOCs and are also listed in Table 3 as RFA LOCs. The following apply to each site:

- No further action is required as per Regulatory Agency Concurrence Letter (date listed) based on Closure Report (date listed).
- The allowable use is residential as long as the applicable notifications and restrictions outlined in Section 5 of this FOST are adhered to.
- No engineering controls, institutional controls, or restrictions are required for any of the LOCs. Relevant notifications and restrictions for buildings/structures/facilities associated with LOCs are summarized in Table 16a/b.
- Operation and Maintenance requirements are not applicable.
- Public outreach activities were effected through the public comment period for the FOST (April 28 to May 28, 2003 and May 3 to June 17, 2004) and Restoration Advisory Board meetings. Pertinent information can be found at <http://www.efds.w.navy.mil/environmental/envhome.htm>.

Source: Earth Tech 2003.

DTSC = Department of Toxic Substances Control  
 ECP = Environmental Condition of Property  
 FOST = Finding of Suitability to Transfer  
 ID = Identification  
 IRP = Installation Restoration Program  
 LOC = Location of Concern  
 NFA = No Further Action  
 OWS = Oil/Water Separator  
 RCRA = Resource Conservation and Recovery Act  
 RFA = RCRA Facility Assessment  
 RWQCB = Regional Water Quality Control Board



Table 10: PCB Transformers and PCB Transformer/Equipment Storage Areas

Transfer Parcel	Building No.	Transformer ID	Transformer Type/Storage Area	Notes	ECP Category
<b>Navy Sale Parcel I</b>					
I-A	12	PCB T2	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	19	PCB T3	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	58	PCB T5	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	59	PCB T6	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	59	PCB T7	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	59	PCB T8	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	60	PCB T9	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	264	PCB T34	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	264	PCB T35	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	272	PCB T36	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates transformer has been replaced; new transformer appears to be in good condition, with no indication of PCBs; no evidence of release observed. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1

Table 10: PCB Transformers and PCB Transformer/Equipment Storage Areas

Transfer Parcel	Building No.	Transformer ID	Transformer Type/Storage Area	Notes	ECP Category
I-A	272	PCB T37	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates transformer has been replaced; new transformer appears to be in good condition, with no indication of PCBs; no evidence of release observed. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	272	PCB T38	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates transformer has been replaced; new transformer appears to be in good condition, with no indication of PCBs; no evidence of release observed. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	281	PCB T39	Pad	Removed. 1994 field survey indicates building has been demolished; no evidence of transformer. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	281	PCB T40	Pad	Removed. 1994 field survey indicates building has been demolished; no evidence of transformer. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	281	PCB T41	Pad	Removed. 1994 field survey indicates building has been demolished; no evidence of transformer. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	285	PCB T42	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates transformer has been replaced; new transformer appears to be in good condition, with no indication of PCBs; no evidence of release observed. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	285	PCB T43	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates transformer has been replaced; new transformer appears to be in good condition, with no indication of PCBs; no evidence of release observed. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	285	PCB T44	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates transformer has been replaced; new transformer appears to be in good condition, with no indication of PCBs; no evidence of release observed. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	327	PCB T46	Pole	Removed. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	327	PCB T47	Pole	1994 field survey indicates non-PCB transformer; no evidence of release observed. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1

Table 10: PCB Transformers and PCB Transformer/Equipment Storage Areas

Transfer Parcel	Building No.	Transformer ID	Transformer Type/Storage Area	Notes	ECP Category
I-A	327	PCB T48	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	365	PCB T52	Pad	Removed. Building demolished in 1988 and another building was constructed at the location; therefore, location could not be inspected. No PCB releases identified through the records search conducted for the 2003 EBS.	1
I-A	410	PCB T64	Pole	Removed. 1994 field survey indicates no evidence of release observed. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	410	PCB T65	Pole	Removed. 1994 field survey indicates no evidence of release observed. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	449	PCB T70	Pad	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	450	PCB T71	Pad	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	451	PCB T72	Pad	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	452	PCB T73	Pad	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	630	PCB T83	Pole	Removed. Building demolished; no evidence of release observed during 1994 field survey. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	692	PCB T91	Pole	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	692	PCB T92	Pole	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	692	PCB T93	Pole	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	687	PCB T103	Pole	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1

Table 10: PCB Transformers and PCB Transformer/Equipment Storage Areas

Transfer Parcel	Building No.	Transformer ID	Transformer Type/Storage Area	Notes	ECP Category
I-A	687	PCB T104	Pole	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	687	PCB T105	Pole	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	271	PCB T110	Pad	Transformer was tested and PCB concentration was less than 1 ppm. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	271	PCB T111	Pad	Transformer was tested and PCB concentration was less than 1 ppm. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	271	PCB T112	Pad	Transformer was tested and PCB concentration was less than 1 ppm. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	833	PCB T113	Pad	Transformer was removed and replaced with a pole-mounted, non-PCB transformer. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	833	PCB T114	Pad	Transformer was removed and replaced with a pole-mounted, non-PCB transformer. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	833	PCB T115	Pad	Transformer was removed and replaced with a pole-mounted, non-PCB transformer. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	263	PCB T116	Pad	Replaced in 1998 with a non-PCB transformer. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
I-A	382	PCB T121	Pad	Replaced in 1998 with a non-PCB transformer. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
<b>Navy Sale Parcel II</b>					
II-A	120	PCB T17	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	120	PCB T18	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1

Table 10: PCB Transformers and PCB Transformer/Equipment Storage Areas

Transfer Parcel	Building No.	Transformer ID	Transformer Type/Storage Area	Notes	ECP Category
II-A	120	PCB T19	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	129	PCB T22	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	129	PCB T23	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	129	PCB T24	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	165	PCB T25	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	203	PCB T26	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	203	PCB T27	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	371	PCB T56	Pad	Replaced with a non-PCB transformer. A minor release of transformer oil containing PCBs was previously noted on the concrete pad of this transformer situated inside Building 371. The transformer was replaced, and the concrete pad was removed. All required response actions have been completed. No further action required.	4
II-A	371	PCB T57	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1

Table 10: PCB Transformers and PCB Transformer/Equipment Storage Areas

Transfer Parcel	Building No.	Transformer ID	Transformer Type/Storage Area	Notes	ECP Category
II-A	406	PCB T63	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	415	PCB T66	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	458	PCB T75	Pad	Replaced with a non-PCB transformer. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	460	PCB T76	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	460	PCB T77	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	464	PCB T78	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	582	PCB T80	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	636	PCB T87	Pad	Replaced with a non-PCB transformer. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	5014	PCB T96	Pole	1994 field survey indicates no evidence in database files. Location of transformer was not able to be verified during VSIs conducted for the 2003 EBS. No PCB releases identified through the records search.	1
II-A	5201	PCB T97	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	5240	PCB T98	Pole	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1

**Table 10: PCB Transformers and PCB Transformer/Equipment Storage Areas**

Transfer Parcel	Building No.	Transformer ID	Transformer Type/Storage Area	Notes	ECP Category
II-A	5417	PCB T99	Pole	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	5417	PCB T100	Pole	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	5417	PCB T101	Pole	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	5215/5216	PCB T102	Pole	Replaced with a non-PCB transformer. 1994 field survey indicates original transformer replaced with a non-PCB transformer; no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1
II-A	711	PCB T123	Pad	Replaced in 1998 with a non-PCB transformer. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.	1

Note: All PCB transformers and PCB transformer/equipment storage areas listed in Table 10 are previously-identified LOCs and the following apply to each site:

- The allowable use is residential as long as the applicable notifications and restrictions outlined in Section 5 of this FOST are adhered to.
- No engineering controls, institutional controls, or restrictions are required for any of the LOCs. Relevant notifications and restrictions for buildings/structures/facilities associated with LOCs are summarized in Table 16a/b.
- Operation and Maintenance requirements are not applicable.
- Public outreach activities were effected through the public comment period for the FOST (April 28 to May 28, 2003 and May 3 to June 17, 2004) and Restoration Advisory Board meetings. Pertinent information can be found at <http://www.efdsww.navfac.navy.mil/environmental/envhome.htm>.

Source: USMC/SWDIV 2003; Earth Tech 2003.

DTSC = California Department of Toxic Substances Control  
 EBS = Environmental Baseline Survey  
 ECP = Environmental Condition of Property  
 ID = Identification  
 FOST = Finding of Suitability to Transfer  
 LOC = Location of Concern  
 PCB = Polychlorinated Biphenyl  
 ppm = parts per million  
 VSI = Visual Site Inspection

Table 11: Non-Transformer PCB Equipment

Transfer Parcel	Building No.	Description	PCB Concentration (mg/l)	Notes	ECP Category
<b>Navy Sale Parcel I</b>					
I-A	56	3 oil-filled cutouts	1.4	N/A	1
I-A	382	oil-filled switch	<1.0	N/A	1
I-A	733	3 oil-filled cutouts	<1.0	N/A	1
<b>Navy Sale Parcel II</b>					
II-A	138	3 oil-filled cutouts	1	N/A	1
II-A	384	3 oil-filled cutouts	8.2	On transformer	1
II-A	414	3 oil-filled cutouts	<1.0	N/A	1
II-A	619	3 oil-filled cutouts	<1.0	Transformer room	1
II-A	664	3 oil-filled cutouts	<1.0	Exterior	1

Note: All non-transformer PCB equipment sites listed in Table 11 were not previously-identified LOCs. The following apply to each site:

- The allowable use is residential as long as the applicable notifications and restrictions outlined in Section 5 of this FOST are adhered to.
- No engineering controls, institutional controls, or restrictions are required for any of the LOCs. Relevant notifications and restrictions for buildings/structures/facilities associated with LOCs are summarized in Table 16a/b.
- Operation and Maintenance requirements are not applicable.
- Public outreach activities were effected through the public comment period for the FOST (April 28 to May 28, 2003 and May 3 to June 17, 2004) and Restoration Advisory Board meetings. Pertinent information can be found at <http://www.efds.w.navy.mil/environmental/envhome.htm>.

Source: USMC/SWDIV 2003; Earth Tech 2003.

<	=	less than
DTSC	=	California Department of Toxics Substances Control
ECP	=	Environmental Condition of Property
FOST	=	Finding of Suitability to Transfer
LOC	=	Location of concern
mg/l	=	milligrams per liter
N/A	=	Not Applicable
PCB	=	Polychlorinated Biphenyl



Table 12: Miscellaneous Locations of Concern

Transfer Parcel	MSC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
<b>Navy Sale Parcel I</b>							
I-A	MSC ST 20A	625	Petroleum Storage	Site Assessment Report, South Drainage Ditch at the Hobby Shop Site 10/2/1997  by NAVFAC EFD Southwest	RWQCB 10/28/1997	Former IRP Site 20, Unit 2. Site is inactive. RWQCB concurred with NFA on 10/28/1997. No further action required.	2b
I-A	MSC ST20B	625	Petroleum Storage	Closure Report, Removal & Remediation of UST 625 6/28/1996  by OHM	RWQCB 9/11/1996	Former IRP Site 20, Unit 3. Site is inactive. In a letter dated 9/11/1996, RWQCB concurred with agreements reached at the August 21, 1996 BCT meeting that Site 20, Unit 3 coincides with UST 625, which was closed by RWQCB in a letter dated August 13, 1996. Therefore, no further action is required at MSC ST20B.	2b
I-A	MSC W1	East of Building 364	Former Elevated Water Reservoir (West Tower)	Summary Report, Former Water Tower Structure 373 (MSC W1) & Former Water Tower Structure 222 (MSC W2) 8/12/1999  by OHM	DTSC 11/1/1999 RWQCB 10/18/2000	Former elevated water reservoir (west tower). Site has been removed. Draft EBS Report interviews identified past mercury releases from level gauge. Additional interviews conducted during 1998 clarified that no water level gauge existed at MSC W1 (west tower-Structure 373), and that water level gauge at MSC W2 (east tower-Structure 222) monitored both water towers. No releases were identified, and the site was recommended for no further action. NFA concurrence obtained from DTSC in a letter dated 1 November 1999. No further action required.	1

Table 12: Miscellaneous Locations of Concern

Transfer Parcel	MSC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
I-A	MSC W2	East of Building 364	Former Elevated Water Reservoir (East Tower)	Summary Report, Former Water Tower Structure 373 (MSC W1) & Former Water Tower Structure 222 (MSC W2) 8/12/1999  by OHM	DTSC 11/1/1999 RWQCB 10/18/2000	Former elevated water reservoir (east tower). Site has been removed. Potential mercury spill identified at tower. Reported past mercury releases from level gauge identified through an interview. All required response actions have been completed, and the site was recommended for NFA. NFA concurrence obtained from DTSC in a letter dated 1 November 1999. No further action required.	4
Navy Sale Parcel II							
II-A	MSC P1	1687	Past Pesticide Storage Area	Closure Report, Former Pesticide Area MSC P1, Unit 1 12/2/2003	DTSC 3/30/2004	Past pesticide storage area at Building 1687. Site is inactive. Samples were collected in 1999, and a summary report was submitted to DTSC in 2002. A subsequent report was sent to DTSC in 2003. Based on risk screening, DTSC concurred with NFA in a letter dated 3/30/2004. No further action required.	3
II-A	MSC P2	464	Past Pesticide Storage Area	Summary Report, Former Pesticide Storage Area MSC P2 1/31/2000  by OHM	RWQCB 9/28/2000 DTSC 1/2/2004	Site is inactive and was identified as a past pesticide storage area near Building 464. Storage was identified as occurring prior to 1959. Samples were collected in 1999 and 2000. Summary Report was submitted in 2000. Based on risk screening, RWQCB concurred with NFA in a letter dated 9/28/2000. DTSC concurred with NFA in a letter dated 1/2/2004. No further action required.	3

Table 12: Miscellaneous Locations of Concern

Transfer Parcel	MSC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes	ECP Category
II-A	MSC ST19A	IRP Site 19	Petroleum Storage	Site Assessment Report, Aircraft Expeditionary Refueling (ACER) Site Northwest Stained Area (Former IRP Site 19 Unit 1) 4/1/1997  by OHM	RWQCB 5/14/1997	Petroleum storage area. Site is inactive. RWQCB concurred with NFA on 5/14/1997. No further action required.	2b

Note: All MSC sites listed in Table 11 are previously-identified LOCs and the following apply to each site:

- No further action is required as per Regulatory Agency Concurrence Letter (date listed) based on Closure Report (date listed).
- The allowable use is residential as long as the applicable notifications and restrictions outlined in Section 5 of this FOST are adhered to.
- No engineering controls, institutional controls, or restrictions are required for any of the LOCs. Relevant notifications and restrictions for buildings/structures/facilities associated with LOCs are summarized in Table 16a/b.
- Operation and Maintenance requirements are not applicable.
- Public outreach activities were effected through the public comment period for the FOST (April 28 to May 28, 2003 and May 3 to June 17, 2004) and Restoration Advisory Board meetings. Pertinent information can be found at <http://www.efds.w.navy.mil/environmental/envhome.htm>.

Source: USMC/SWDIV 2003; Earth Tech 2003.

DTSC	=	Department of Toxic Substances Control
EBS	=	Environmental Baseline Survey
ECP	=	Environmental Condition of Property
FOST	=	Finding of Suitability to Transfer
ID	=	Identification
IRP	=	Installation Restoration Program
LOC	=	Location of Concern
MSC	=	Miscellaneous
NAVFAC EFD Southwest	=	Southwest Division Naval Facilities Engineering Command, San Diego
NFA	=	No Further Action
RWQCB	=	Regional Water Quality Control Board

Table 13: Environmental Factors Considered

Environmental Factors Considered	Environmental Factors May Pose Restriction or Require Notification?			
	Transfer Parcel			
	I-A	II-A	III-A	IV
Hazardous substances and petroleum products	yes	yes	yes	no
Installation Restoration Program sites	yes	yes	yes	no
Storage tanks (ASTs and USTs)	yes	yes	yes	no
Wastewater treatment and related systems	yes	yes	no	no
Polychlorinated biphenyls	yes	yes	no	no
Medical/biohazardous waste	yes	no	no	no
Ordnance	yes	yes	no	no
Pesticides	yes	yes	yes	yes
Radiological material investigation locations	no	no	no	no
Miscellaneous locations of concern	yes	yes	no	no
Asbestos-containing material	yes	yes	yes	no
Lead-based paint	yes	yes	yes	no
Monitoring wells	no	no	no	no
Radon	yes	yes	yes	yes
School Considerations	yes	yes	yes	yes
Groundwater use/Subsurface excavation	no	no	no	no

Source: Earth Tech 2003

AST = aboveground storage tank

UST = underground storage tank

Table 14: Summary of Asbestos Surveys

Transfer Parcel	Building No.	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
<b>Navy Sale Parcel I</b>						
I-A	3	COMM MNT SHOP	1560	1943	IT Corp (1989): No ACM Found	No ACM found.
I-A	4	ELEC/COMM MAINT SHOP	1560	1943	IT Corp (1989): No ACM Found	No ACM found.
I-A	8	STORAGE	1560	1943	IT Corp (1989): No ACM Found	No ACM found.
I-A	9	STORAGE	1560	1942	IT Corp (1989): No ACM Found	No ACM found.
I-A	11	SQUADRON HEADQUARTERS	3960	1943	IT Corp (1989): Floor tile. CABACO/Tait (6/15/99): No ACM identified	Non-FAD ACM found.
I-A	12	GROUP HQ	3960	1943	e&e (1991): Floor tile, roofing, linoleum. CABACO/Tait (6/15/99): No ACM identified	Non-FAD ACM found.
I-A	13	GROUP HQ	3960	1943	CABACO/Tait (6/15/99): Stucco	Non-FAD ACM found; no interior ACM observed.
I-A	14	SQDRN HQ	3960	1943	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
I-A	15	STOREHOUSE/ELECTRONICS MAINT	6240	1943	IT Corp (1989): Transite	Non-FAD ACM found; not surveyed since 1997.
I-A	16	STORAGE GROUP	6240	1943	IT Corp (1989): No ACM Found	No ACM found.
I-A	19	ADMIN OFF	6240	1943	IT Corp (1989): Floor tile	Non-FAD ACM found; not surveyed since 1997.
I-A	20	STRG/OUT OF STORES MARCOR	6240	1943	IT Corp (1989): No ACM Found	No ACM found.
I-A	21	STORAGE	640	1943	IT Corp (1989): No ACM Found	No ACM found.
I-A	23	STORAGE	6240	1943	IT Corp (1989): Floor tile	Non-FAD ACM found; not surveyed since 1997.
I-A	48	FIU HEADQUARTERS	5148	1943	IT Corp (1989): No ACM Found	No ACM found.
I-A	52	STOREHOUSE	4224	1943	IT Corp (1989): No ACM Found. CABACO/Tait (7/22/99): Stucco	Non-FAD ACM found; no interior ACM observed.
I-A	53	GROUND SAFETY	4036	1943	IT Corp (1989): No ACM Found	No ACM found.
I-A	54	LAW CENTER	11374	1943	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
I-A	56	TRNG/ELEC COMM/GRD SAFETY	11528	1943	IT Corp (1989): Floor tile	Non-FAD ACM found; not surveyed since 1997.

Table 14: Summary of Asbestos Surveys

Transfer Parcel	Building No.	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
I-A	57	BATHHOUSE	9310	1943	e&e (1991): Floor tile, roofing, transite pipe, pipe insulation, pipe fitting insulation. CABACO/Tait (6/15/99): Pipe insulation mastic, pipe elbow, cement pipes (assumed)	FAD ACM found.
I-A	58	JOINT RECEPTION CENTER	30610	1943	IT Corp (1989): Floor tiles, tank insulation, transite, pipe insulation, acoustical insulation	FAD ACM found.
I-A	59	ADMINISTRATIVE OFFICES	5696	1943	IT Corp (1989): No ACM Found	No ACM found.
I-A	60	RESERVE SUPPORT UNIT	5376	1943	IT Corp (1989): Floor tile. CABACO/Tait (6/15/99): Stucco, floor tile & mastic	Non-FAD ACM found.
I-A	61*	GATEHOUSE	792	1943	e&e (1991): Floor tile, roofing	Non-FAD ACM found; not surveyed since 1997.
I-A	63*	STORAGE	4896	1943	IT Corp (1989): Floor tile, transite, pipe insulation, roofing	Non-FAD ACM found; not surveyed since 1997.
I-A	66	ADMINISTRATION/DISBURSING	12924	1943	e&e (1991): Floor tile, roofing, transite panel, pipe insulation, pipe fitting insulation, blackboard	FAD ACM found.
I-A	77	COOK SCH/EXCH BLDG	20106	1943	IT Corp (1989): Floor tile, tank insulation, transite, pipe insulation	FAD ACM found.
I-A	83	LRA OFFICES [CHAPEL ADMIN OFFICE]	12180	1943	IT Corp (1989): Transite. CABACO/Tait (6/15/99): Stucco, floor tile, mastic. No FAD ACM observed on 8/1/00-8/3/00	Non-FAD ACM found.
I-A	94	PHYSICAL FITNESS TRNG CENTER	23123	1943	IT Corp (1989): Floor tile, pipe insulation. CABACO/Tait (6/15/99): Tile mastic, pipe elbows, pipe insulation	FAD ACM found.
I-A	146	MCAS HQ-EMER GENERATOR BLDG	360	1943	IT Corp (1989): No ACM Found	No ACM found.
I-A	256	TRNG BLDG/PHYSIC SURV	13056	1945	IT Corp (1989): No ACM Found. CABACO/Tait (6/15/99): Floor tile mastic	Non-FAD ACM found.
I-A	257	ADMIN/LEGAL	4596	1944	IT Corp (1989): No ACM Found. CABACO/Tait (6/15/99): Floor tile mastic, stucco, drywall joint compound	Non-FAD ACM found.
I-A	263	EDUCATION BUILDING	12404	1945	IT Corp (1989): Linoleum, transite, pipe insulation	Non-FAD ACM found; not surveyed since 1997.
I-A	271	AUDITORIUM	26733	1944	IT Corp (1989): No ACM Found. CABACO/Tait (7/22/99): Floor tile mastic	Non-FAD ACM found.
I-A	273	POST OFFICE	5104	1944	IT Corp (1989): No ACM Found	No ACM found.

Table 14: Summary of Asbestos Surveys

Transfer Parcel	Building No.	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
I-A	275	BAND TRAINING	12960	1944	IT Corp (1989): Transite, floor tile, tank insulation	FAD ACM found.
I-A	276	STORAGE	12960	1945	IT Corp (1989): Transite, floor tile, tank insulation, pipe insulation	FAD ACM found.
I-A	277	VACANT	12960	1945	IT Corp (1989): Transite, tank insulation, pipe insulation	Non-FAD ACM found; not surveyed since 1997.
I-A	279	FAMILY SVCS/DRUG & ALCOHOL	12960	1945	IT Corp (1989): No ACM Found	No ACM found.
I-A	285	CLUB SYSTEM WAREHOUSE	16000	1944	IT Corp (1989): Insulation debris. CABACO/Tait (6/15/99): Stucco, window putty, mastic (in freezer). No FAD ACM observed on 8/1/00-8/3/00	Non-FAD ACM found.
I-A	288	STA ACFT ADMIN BLDG	4160	1944	IT Corp (1989): Floor tile, pipe insulation. CABACO/Tait (6/15/99): Stucco	FAD ACM found.
I-A	289	STA ACFT HANGAR	10370	1944	IT Corp (1989): Floor tile. CABACO/Tait (6/15/99): Stucco, window putty, floor tile & mastic	Non-FAD ACM found.
I-A	327*	DORMITORY	43928	1945	IT Corp (1989): Transite, tank insulation, pipe insulation, linoleum	Non-FAD ACM found; not surveyed since 1997.
I-A	328	GROUP HEADQUARTERS	43923	1945	IT Corp (1989): Tank insulation, pipe insulation, floor tile	FAD ACM found.
I-A	329	DECA HEADQUARTERS	22328	1945	IT Corp (1989): Tank insulation, pipe insulation, floor tile	FAD ACM found.
I-A	366	BACHELOR ENL QTRS E1/E4	45136	1954	IT Corp (1989): Transite, vibration dampener, pipe insulation	FAD ACM found.
I-A	376	FIRE ALARM HEADQUARTERS	1649	1954	e&e (1991): Floor tile. CABACO/Tait (10/15/99): Flue pipes, drywall joint compound, window putty	Non-FAD ACM found.
I-A	382	SUBSTATION	207	1958	e&e (1991): Roofing	Non-FAD ACM found; no interior ACM observed; not surveyed since 1997.
I-A	449	ENLISTED BARRACKS	29109	1959	e&e (1991): Gasket material	FAD ACM found.
I-A	450	ENLISTED BARRACKS	29109	1959	e&e (1991): Gasket material	FAD ACM found.
I-A	451	BARRACKS	29109	1959	e&e (1991): Gasket material	FAD ACM found.
I-A	452	BARRACKS	29109	1959	e&e (1991): Gasket material	FAD ACM found.

Table 14: Summary of Asbestos Surveys

Transfer Parcel	Building No.	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
I-A	471	POOL	N/A	1973	CABACO/Tait (6/15/99): Pipe insulation mastic, pipe elbow, cement pipes (assumed).	No FAD ACM found.
I-A	475	STORAGE BLDG.	192	1946	IT Corp (1989): No ACM Found	No ACM found.
I-A	523	HOBBY SHOP/ARTS/CRAFT	192	1945	IT Corp (1989): No ACM Found	No ACM found.
I-A	578	HEAD-PUMPHSE/RECREATION FAC	300	1957	IT Corp (1989): Transite	Non-FAD ACM found; not surveyed since 1997.
I-A	600	STOREHOUSE/SQDN	4108	1961	IT Corp (1989): Floor tile, mastic, paint	Non-FAD ACM found; not surveyed since 1997.
I-A	615	HANDBALL COURTS/4-WALL	1743	1966	IT Corp (1989): No ACM Found	No ACM found.
I-A	624	PASSENGER AIR TERMINAL	11470	1967	e&e (1991): Floor tile, carpet. CABACO/Tait (6/15/99): Floor tile mastic	Non-FAD ACM found.
I-A	625	HOBBY SHOP-AUTO CENT	10582	1967	e&e (1991): No ACM Found	No ACM found.
I-A	626	HOBBY SHOP-AUTO CENT OFC	488	1967	e&e (1991): No ACM Found	No ACM found.
I-A	629	TRAINING BLDG/FASO/	4260	1968	e&e (1991): Floor tile, roofing	Non-FAD ACM found; not surveyed since 1997.
I-A	656	CHILDCARE/EDUCATION	12733	1971	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
I-A	660	UEPH	51347	1973	IT Corp (1989): Transite, acoustical insulation	FAD ACM found.
I-A	661	UEPH	51347	1973	IT Corp (1989): Transite, acoustical insulation	FAD ACM found.
I-A	666	UEPH	33984	1973	e&e (1991): Floor tile, roofing, acoustical insulation	FAD ACM found.
I-A	667	UEPH	33984	1973	e&e (1991): Floor tile, roofing, acoustical insulation	FAD ACM found.
I-A	668	ENLISTED BARRACKS	33984	1973	e&e (1991): Floor tile, roofing, acoustical insulation	FAD ACM found.
I-A	669	UEPH	33984	1973	e&e (1991): Floor tile, roofing, acoustical insulation	FAD ACM found.
I-A	683	COLD STORAGE/READY ISSUE	15183	1974	e&e (1991): Floor tile, roofing. Per CABACO/Tait (6/15/99): No ACM identified	Non-FAD ACM found.
I-A	684	EJECTION SEAT TRNG BLDG	804	1974	IT Corp (1989): No ACM Found	No ACM found.
I-A	685	ELECTRIC DISTRIBUTION BLDG	200	1974	IT Corp (1989): No ACM Found	No ACM found.



Table 14: Summary of Asbestos Surveys

Transfer Parcel	Building No.	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
I-A	694	COMMISSARY	47120	1975	e&e (1991): Floor tile, roofing. CABACO/Tait (10/15/99): Drywall joint compound, floor tile mastic	Non-FAD ACM found.
I-A	730	COMMUNICATION CENTER	6500	1980	e&e (1991): Floor tile, carpet. CABACO/Tait (10/15/99): Floor tile mastic	Non-FAD ACM found.
I-A	731	UEPH	41157	1980	e&e (1991): Floor tile, roofing, carpet	Non-FAD ACM found; not surveyed since 1997.
I-A	732	UEPH	41157	1980	e&e (1991): Floor tile, roofing, carpet	Non-FAD ACM found; not surveyed since 1997.
I-A	733	BEQ BOILER BLDG	1689	1980	IT Corp (1990): No ACM Found. e&e (1991): Roofing	Non-FAD ACM found; no interior ACM observed; not surveyed since 1997.
I-A	739	UEPH	13350	1982	e&e (1991): No ACM Found	No ACM found.
I-A	740	UEPH	40996	1982	e&e (1991): Floor tile, roofing, carpet	Non-FAD ACM found; not surveyed since 1997.
I-A	741	UEPH	45415	1982	e&e (1991): Floor tile, roofing, carpet	Non-FAD ACM found; not surveyed since 1997.
I-A	744	ARMORY	10789	1983	e&e (1991): No ACM Found CABACO/Tait (10/15/99): No ACM identified	No ACM found.
I-A	757	MARS FACILITY	1716	1983	e&e (1991): Floor tile, roofing	Non-FAD ACM found; not surveyed since 1997.
I-A	793	MCDONALD'S	3754	1985	e&e (1991): No ACM Found. CABACO/Tait (6/15/99): No ACM identified	No ACM found.
I-A	799	CLASS IV PACKAGE STORE	10000	1986	CABACO/Tait (6/15/99): Roofing	Non-FAD ACM found; no interior ACM observed.
I-A	823	TEMPORARY LODGING FACILITY	23800	1986	CABACO/Tait (10/15/99): No ACM identified	No ACM found.
I-A	829	MARINE AIR WING HEADQUARTERS	45907	1988	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
I-A	833	CHAPEL REPLACEMENT	7228	1988	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
I-A	839	POOL	20820	1987	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
I-A	842	UEPH E-1 THRU E-4	271550	1989	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
I-A	852	MECHANICAL BLDG. AREA "G"	2576	1989	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
I-A	873	CHILDCARE/EDUCATION	23375	1991	CABACO/Tait (6/15/99): No ACM identified	No ACM found.

Table 14: Summary of Asbestos Surveys

Transfer Parcel	Building No.	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
I-A	876	VETERINARY FACILITY	1300	1990	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
I-A	899	DATA PROCESSING CENTER/BRAC	22107	1993	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
I-A	1524*	STORAGE SHED	180	1945	e&e (1991): Roofing, transite panels	Non-FAD ACM found.
I-A	1815	METAL STORAGE BUILDING	100	1979	e&e (1991): No ACM Found	No ACM found.
I-A	5101	3RD MAW CG QTRS	2819	1943	CABACO/Tait (6/15/99): Floor tile & mastic. PWC (1/10/96): No ACM identified	Non-FAD ACM found; not surveyed since 1997.
I-A	5102	MCASET CG QTRS	2969	1943	CABACO/Tait (6/15/99): Floor tile & mastic, sheet vinyl flooring, pipe insulation. PWC (1/10/96): Pipe insulation, spray-on acoustical ceiling, transite, linoleum	Non-FAD ACM found; not surveyed since 1997.
I-A	Saddleback Senior Officer Quarters	SADDLEBACK TERRACE - SENIOR OFFICER QUARTERS - 2 UNITS (2 FLOOR PLANS)	5888	1943	PWC (1/10/96): Pipe insulation, floor tile, mastic, linoleum transite sheeting, spray-on acoustical ceiling	Non-FAD ACM found; not surveyed since 1997.
I-A	Saddleback II Senior Officer Quarters	SADDLEBACK TERRACE II - SENIOR OFFICER QUARTERS - 17 UNITS (4BR, 2 FLOOR PLANS, ASSUMED APPROX 1250 SF EACH)	21250	1964	PWC (11/17/95): Paper tape/wrap on HVAC duct in attic, linoleum, transite furnace door (assumed).	Non-FAD ACM found; not surveyed since 1997.
I-A	Saddleback Other Public Quarters	SADDLEBACK TERRACE - OTHER PUBLIC QUARTERS - 50 UNITS (50 3BR - 2 FLOOR PLANS)	168291	1947	PWC (11/21/95): Spray-on acoustical ceiling, transite flue pipe (assumed), HVAC duct tape, roofing, floor tile	Non-FAD ACM found; not surveyed since 1997.
<b>Navy Sale Parcel II</b>						
II-A	120	AVIATION ARM SHOP	6240	1943	IT Corp (1989): No ACM Found CABACO/Tait (7/22/99): Stucco	Non-FAD ACM found; no interior ACM observed.
II-A	121	FIRE STATION-STORAGE	6240	1943	CABACO/Tait (7/22/99): Stucco	Non-FAD ACM found; no interior ACM observed.
II-A	122	MAINTENANCE/ADMIN	6240	1943	IT Corp (1989): No ACM Found. CABACO/Tait (6/15/99): Stucco	Non-FAD ACM found; no interior ACM observed.
II-A	123	STORAGE MC	6240	1943	IT Corp (1989): No ACM Found CABACO/Tait (7/22/99): Stucco, window putty	Non-FAD ACM found.
II-A	132	AVIATION ARM SHOP	6240	1943	IT Corp (1989): No ACM Found	No ACM found.
II-A	134	STORAGE	6240	1943	IT Corp (1989): Floor tile. CABACO/Tait (7/22/99): Stucco, window putty	Non-FAD ACM found.
II-A	135	STOREHOUSE/GRP	6240	1943	IT Corp (1989): No ACM Found CABACO/Tait (7/22/99): Stucco	Non-FAD ACM found; no interior ACM observed.

Table 14: Summary of Asbestos Surveys

Transfer Parcel	Building No.	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
II-A	136	STORAGE OUT OF STORES	6240	1943	IT Corp (1989): No ACM Found	No ACM found.
II-A	138	ELNICS MNT SHOP	6240	1943	IT Corp (1989): Wall board, pipe insulation	FAD ACM found.
II-A	142	STOREHOUSE	640	1943	IT Corp (1989): No ACM Found	No ACM found.
II-A	163	VACANT	1250	1943	IT Corp (1989): No ACM Found	No ACM found.
II-A	164	VACANT	1250	1943	IT Corp (1989): No ACM Found	No ACM found.
II-A	165	HAZ/FLAM STOREHOUSE	1250	1943	IT Corp (1989): No ACM Found	No ACM found.
II-A	166	VACANT	1250	1943	IT Corp (1989): No ACM Found	No ACM found.
II-A	167	VACANT	1250	1943	IT Corp (1989): No ACM Found	No ACM found.
II-A	169	NBC	140	1943	IT Corp (1989): No ACM Found	No ACM found.
II-A	170	INERT STOREHOUSE	1250	1943	IT Corp (1989): No ACM Found	No ACM found.
II-A	171	VACANT	140	1943	IT Corp (1989): No ACM Found	No ACM found.
II-A	172	VACANT	1250	1943	IT Corp (1989): No ACM Found	No ACM found.
II-A	290	GENERAL WAREHOUSE MARCOR	4000	1944	IT Corp (1989): No ACM Found	No ACM found.
II-A	291	STORAGE OUT OF STRS MARCOR	14400	1944	IT Corp (1989): Floor tile	Non-FAD ACM found; not surveyed since 1997.
II-A	292*	SQUADRON HQ	13126	1944	CABACO/Tait (6/15/99): Silver paint on roofing	Non-FAD ACM found; no interior ACM observed.
II-A	341	GSE SHOP	468	1945	IT Corp (1989): No ACM Found	No ACM found.
II-A	371	IMA HANGAR	86652	1954	IT Corp (1989): Mastic. CABACO/Tait (6/15/99): Roof paint, duct connectors	Non-FAD ACM found.
II-A	384	SUBSTATION	160	1954	e&e (1991): Roofing	Non-FAD ACM found; no interior ACM observed; not surveyed since 1997.
II-A	397*	PUMPHOUSE	110	1956	e&e (1991): Floor tile	Non-FAD ACM found; not surveyed since 1997.
II-A	402	STABLES (TOILET)	75	1957	No FAD ACM observed on 8/1/00-8/3/00	No FAD ACM observed; non-FAD ACM unknown.
II-A	404	TRANSMITTER BUILDING	909	1957	e&e (1991): Roofing, floor tile	Non-FAD ACM found; not surveyed since 1997.
II-A	405	INSTRUCTION BUILDING/MAWTU	3208	1983	IT Corp (1989): Duct insulation, pipe insulation	FAD ACM found.

Table 14: Summary of Asbestos Surveys

Transfer Parcel	Building No.	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
II-A	406	AIR CREW WPNS/TACTICS TRNG	2285	1956	IT Corp (1989): Floor tile, acoustical insulation	FAD ACM found.
II-A	407	ADMINISTRATION/SW	400	1956	IT Corp (1989): Floor tile, pipe insulation	Non-FAD ACM found; not surveyed since 1997.
II-A	415	WAREHOUSE	40313	1957	IT Corp (1989): Floor tile, pipe insulation. CABACO/Tait (6/15/99): Roofing, window putty, pipe elbows	Non-FAD ACM found.
II-A	416	AIR SURVEILLANCE RADAR BLDG	480	1957	IT Corp (1989): Floor tile	Non-FAD ACM found; not surveyed since 1997.
II-A	440	INERT MISSILE MAG	930	1959	e&e (1991): No ACM Found	No ACM found.
II-A	441	AVIATION ARMAMENT	1500	1959	e&e (1991): Pipe fitting insulation	FAD ACM found.
II-A	453	MAINT SQUADRON HEADQUARTERS	5040	1960	IT Corp (1989): Caulking. CABACO/Tait (6/15/99): Pipe elbows (assumed), floor tile & mastic	Non-FAD ACM found.
II-A	454	MAINT SQUADRON HEADQUARTERS	5040	1960	IT Corp (1989): Caulking, pipe insulation. CABACO/Tait (6/15/99): Pipe elbows (assumed), floor tile & mastic	Non-FAD ACM found.
II-A	455	OPERATIONAL TRAINER FACILITY	9040	1960	CABACO/Tait (6/15/99): Roofing	Non-FAD ACM found; no interior ACM observed.
II-A	456	ORGANIC STORAGE/AVIATION SUPPLY OFFICE	70163	1960	e&e (1991): Floor tile, roofing, pipe fitting insulation. CABACO/Tait (6/15/99): Floor tile mastic. No FAD ACM observed on 8/1/00-8/3/00	Non-FAD ACM found.
II-A	458	FLAMMABLE STOREHOUSE	2000	1960	e&e (1991): No ACM Found	No ACM found.
II-A	459	STORAGE TANK (GOLF COURSE)	1M Gal		No FAD ACM observed on 8/1/00-8/3/00	No FAD ACM observed; non-FAD ACM unknown.
II-A	460	WATER SUPPLY BUILDING (GOLF COURSE)	438	1959	No FAD ACM observed on 8/1/00-8/3/00	No FAD ACM observed; non-FAD ACM unknown.
II-A	461	HANGAR/SQUADRON	35362	1960	CABACO/Tait (6/15/99): Floor tile mastic, exterior metal coating, pipe insulation mastic	Non-FAD ACM found.
II-A	463	HANGAR/SQUADRON	15519	1960	IT Corp (1989): Floor tile, pipe insulation. CABACO/Tait (6/15/99): Floor tile & mastic, exterior metal coating, mirror mastic, window putty	Non-FAD ACM found.

Table 14: Summary of Asbestos Surveys

Transfer Parcel	Building No.	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
II-A	464	GOLF COURSE CLUBHOUSE	8748	1959	IT Corp (1989): Pipe insulation, acoustical insulation. CABACO/Tait (6/15/99): Stucco, window putty, ceiling texture, duct connectors. No FAD ACM observed on 8/1/00-8/3/00. (No access to women's locker or restroom)	Non-FAD ACM found.
II-A	469	GATEHOUSE	69	1959	IT Corp (1989): No ACM Found	No ACM found.
II-A	607	GOLF COURSE, PUBLIC TOILET	92	1965	No FAD ACM observed on 8/1/00-8/3/00	No FAD ACM observed; non-FAD ACM unknown.
II-A	611	G-M MAGAZINE	930	1966	e&e (1991): No ACM Found	No ACM found.
II-A	619	STANDBY GENERATOR BUILDING	1329	1966	e&e (1991): Roofing, pipe insulation. CABACO/Tait (10/15/99): No ACM identified. Radian (Jan-01): No FAD ACM observed	Non-FAD ACM found.
II-A	636	SURVIVAL EQUIPMENT SHOP	9030	1969	e&e (1991): Floor tile, roofing, pipe fitting insulation, boiler insulation.	FAD ACM found.
II-A	664	SUBSTATION BLDG.	625	1972	IT Corp (1989): No ACM Found	No ACM found.
II-A	676	COMMUNITY STRG (MISC)	1750	1973	e&e (1991): No ACM Found	No ACM found.
II-A	678	HOUSING/MAINT STORAGE	1750	1973	e&e (1991): No ACM Found	No ACM found.
II-A	679	STABLES	1100	1973	No FAD ACM observed on 8/1/00-8/3/00	No FAD ACM observed; non-FAD ACM unknown.
II-A	686	STABLES	2500	1974	No FAD ACM observed on 8/1/00-8/3/00	No FAD ACM observed; non-FAD ACM unknown.
II-A	688**	RECEIVER BUILDING	144	1973	e&e (1991): Roofing	Non-FAD ACM found; no interior ACM observed; not surveyed since 1997.
II-A	713	GENERAL STORAGE SHED	3, 60	1977	IT Corp (1989): No ACM Found	No ACM found.
II-A	714	FLIGHT LINE NO. 2	1000	1977	e&e (1991): Floor tile, roofing	Non-FAD ACM found; not surveyed since 1997.
II-A	715	FLIGHT LINE FACILITY NO. 1	1000	1977	e&e (1991): Floor tile, roofing	Non-FAD ACM found; not surveyed since 1997.
II-A	722	CONVENIENCE FOOD STORE	12000	1980	e&e (1991): Floor tile, roofing, fire door, linoleum	Non-FAD ACM found; not surveyed since 1997.
II-A	727	FLIGHT LINE SHELTER	1000	1981	e&e (1991): Roofing, carpet	Non-FAD ACM found; not surveyed since 1997.

Table 14: Summary of Asbestos Surveys

Transfer Parcel	Building No.	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
II-A	728	FLIGHT LINE SHELTER	1000	1983	e&e (1991): Roofing	Non-FAD ACM found; no interior ACM observed; not surveyed since 1997.
II-A	762	VEHICLE WASH RACK PUMP, GOLF COURSE	228	1984	No FAD ACM observed on 8/1/00-8/3/00	No FAD ACM observed; non-FAD ACM unknown.
II-A	782	GOLF COURSE (STORAGE)	1320	1983	e&e (1991): No ACM Found	No ACM found.
II-A	785	PASCOE BUILDING	5600	1984	e&e (1991): No ACM Found	No ACM found.
II-A	786	AVIATION ARMAMENT BLDG	3000	1984	e&e (1991): No ACM Found	No ACM found.
II-A	790	GOLF COURSE (GOLF CART BLDG)	3471	1985	e&e (1991): No ACM Found	No ACM found.
II-A	792	STABLES	2880	1984	No FAD ACM observed on 8/1/00-8/3/00	No FAD ACM observed; non-FAD ACM unknown.
II-A	817	VEHICLE WASH BLDG, GOLF COURSE	288	1985	No FAD ACM observed on 8/1/00-8/3/00. (one room locked)	No FAD ACM observed; non-FAD ACM unknown.
II-A	828	STABLES	1120	1987	No FAD ACM observed on 8/1/00-8/3/00	No FAD ACM observed; non-FAD ACM unknown.
II-A	881	STABLES	7700	1989	No FAD ACM observed on 8/1/00-8/3/00	No FAD ACM observed; non-FAD ACM unknown.
II-A	882	STABLES - RENTAL OFFICE	1152	1989	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
II-A	883	STABLES	965	1989	No FAD ACM observed on 8/1/00-8/3/00	No FAD ACM observed; non-FAD ACM unknown.
II-A	884	STABLES - BUNKHOUSE	759	1989	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
II-A	885	STABLES	585	1987	No FAD ACM observed on 8/1/00-8/3/00	No FAD ACM observed; non-FAD ACM unknown.
II-A	895	OPERATIONAL TRAINER FAC	5000	1992	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
II-A	901	HAZ/FLAMM STOREHOUSE	8800	1993	CABACO/Tait (6/15/99): No ACM identified	No ACM found.
II-A	1538	FILLING STATION BLDG	64	1945	e&e (1991): No ACM Found	No ACM found.
II-A	1650	AVIATION ARMAMENT	1680	1947	e&e (1991): No ACM Found	No ACM found.
II-A	1721	GUARD QUARTERS	960	1946	e&e (1991): Floor tile	Non-FAD ACM found; not surveyed since 1997.
II-A	1787	AVIATION ARMAMENT	836	1958	e&e (1991): No ACM Found	No ACM found.
II-A	1791	ORDNANCE BLDG	1680	1946	e&e (1991): No ACM Found	No ACM found.

Table 14: Summary of Asbestos Surveys

Transfer Parcel	Building No.	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
II-A	1798	STABLES	2700	1963	No FAD ACM observed on 8/1/00-8/3/00	No FAD ACM observed; non-FAD ACM unknown.
II-A	NAMAR Housing	NAMAR HOUSING - 216 UNITS (61 1BR, 134 2BR, 21 3BR - 3 FLOOR PLANS)	110674	1945	PWC (12/11/95): Floor tile, linoleum, spray-on acoustical ceiling, roofing vent pipe mastic	Non-FAD ACM found; not surveyed since 1997.
II-A	San Joaquin Housing	SAN JOAQUIN HOUSING - 300 UNITS (150 2BR and 150 4BR - 3 FLOOR PLANS)	369375	1973	PWC (11/27/95): Transite flue pipe acoustical ceiling material, linoleum	Non-FAD ACM found; not surveyed since 1997.
II-A	Wherry Housing	WHERRY HOUSING - 553 UNITS (51 2BR, 441 3BR, 61 4BR - 26 FLOOR PLANS)	540713	1954	PWC (11/27/95): Roofing, linoleum. Earth Tech (2003): Floor tile, linoleum, drywall, stucco.	Non-FAD ACM found.
II-A	Vista Terrace	VISTA TERRACE HOUSING - 50 UNITS (13 1BR, 24 2BR, 13 3BR - 3 FLOOR PLANS)	108702	1947	PWC (11/21/95): Acoustical ceiling material, transite flue pipe, floor tile and mastic	Non-FAD ACM found; not surveyed since 1997.
<b>Navy Sale Parcel III</b>						
III-A	25*	CARPENTRY SHOP	6240	1943	IT Corp (1989): No ACM Found	No ACM found.
III-A	27	PMO ADMIN STORAGE	6240	1943	IT Corp (1989): No ACM Found CABACO/Tait (10/15/99): No ACM identified	No ACM found.
III-A	241	M C CLOTHING SALES	14400	1945	IT Corp (1989): No ACM Found CABACO/Tait (6/15/99): Stucco	Non-FAD ACM found; no interior ACM observed.
III-A	251	CONFERENCE CENTER	4299	1944	IT Corp (1989): No ACM Found CABACO/Tait (6/15/99): Stucco	Non-FAD ACM found; no interior ACM observed.

Source: USMC/SWDIV 2003.

Notes: Table 15 lists the results of the asbestos evaluation for the portion of Wherry Housing Units that are proposed for reuse.

\* Indicates that the building was present during the 1993 asbestos survey but has subsequently been demolished.

\*\* Building 688 is part of the transferred FAA Parcel and is not discussed further in this FOST.

The information presented in this table was obtained from the listed source. The 'comments' field provides an evaluation of this information in a format consistent with categorization 'a', 'b', 'c', and 'd', as discussed in Section 5.11.

ACFT	= Aircraft	MARS	= Military Affiliate Radio System
ACM	= Asbestos-containing material	MAINT	= Maintenance
ARM	= Armament	MAW	= Marine Air Wing
ADMIN	= Administration	MAWTU	= Marine Air Weapons Training Unit
BEQ	= Bachelor enlisted quarters	MC	= Marine Corps
BLDG	= Building	MCAS	= Marine Corps Air Station
CENT	= Center	MCASET	= Marine Corps Air Station, El Toro
CG	= Commanding General	MISC	= Miscellaneous
COMM	= Communications	MNT	= Maintenance
ELEC	= Electrical	NAMAR	= NAMAR Housing
EMER	= Emergency	N/A	= Not Applicable
ENL	= Enlisted	NBC	= Nuclear, Biological, Chemical
EXCH	= Exchange	OFC	= Office

Table 14: Summary of Asbestos Surveys

Transfer Parcel	Building No.	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
FAC	=	Facility		OFF	=	Office
FAD	=	Friable and damaged		PHYSIC	=	Physical
FASO	=	Field Aviation Supply Office		PMO	=	Preventative Medicine Office
FIIU	=	Fleet Imagery Interpretation Unit		QTRS	=	Quarters
FLAM	=	Flammable		SCH	=	School
FLAMM	=	Flammable		SQDN	=	Squadron
G-M	=	Guided Missile		STA	=	Station
GRD	=	Ground		STRG	=	Storage
GSE	=	Ground support equipment		SURV	=	Survival
HAZ	=	Hazardous		SVCS	=	Services
HQ	=	Headquarters		SQDRN	=	Squadron
IMA	=	Integrated Maintenance		TRNG	=	Training
LRA	=	Local Reuse Authority		UEPH	=	Unaccompanied Enlisted Personnel Housing
MAG	=	Magazine		WPNS	=	Weapons
MARCOR	=	Marine Corps				



Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	Stable Area (Horse Stables)	No suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	834	12" White Floor Tile	Main Hall	160 SF	350 SF	N/A	N/A	Yes <sup>(a)</sup>
Wherry Housing								
II-A	8601	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8601½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8602	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8602½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8611	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8611½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8641 – North	Earth Tone Sheet Flooring (Top Layer)	Kitchen	5 SF	80 SF	No	N/A	N/A
II-A	8641 – North	Diagonal Lines Sheet Flooring (Bottom Layer)	Kitchen	5 SF	80 SF	Yes	N/A	Yes
II-A	8641½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8641 – South	Earth Tone Sheet Flooring	Bathroom	10 SF	30 SF	No	N/A	N/A
II-A	8641½ – South	Whitish/Brown Speckled Sheet Flooring	Bathroom	5 SF	30 SF	No	N/A	N/A
II-A	8642	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8642½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A

Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	8645½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8645	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8646	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8646½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8651½	Earth Tone Sheet Flooring	Bathroom	5 SF	80 SF	No	N/A	N/A
II-A	8651	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8652	Earth Tone Sheet Flooring	Bathroom	5 SF	35 SF	No	N/A	N/A
II-A	8652½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8662	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8662½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8671 – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8671½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8671 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8671½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8672½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8672	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8675¼	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A

Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	8675	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8675¼	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8675½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8681 – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8681½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8681 – Trabuco	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8681½ – Trabuco	Earth Tone Sheet Flooring	Bathroom #2	15 SF	30 SF	No	N/A	N/A
II-A	8681 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8681½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8682	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8682½	Earth Tone Sheet Flooring	Bathroom #2	5 SF	40 SF	No	N/A	N/A
II-A	8691	Earth Tone Sheet Flooring	Bathroom #2	5 SF	40 SF	No	N/A	N/A
II-A	8691½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8701 – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8701½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8701 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8701½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A

Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	8705	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8705½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8707	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8707¼	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8707½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8707¾	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8711 – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8711½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8711 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8711½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8712 – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8712½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8712 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8712½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8713½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8713	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A

Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	8714½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8714	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8715 – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8715½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8715 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8715½ – South	Earth Tone Sheet Flooring	Bathroom	10 SF	80 SF	No	N/A	N/A
II-A	8715 – Trabuco	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8715½ – Trabuco	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8717½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8717 – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8717¾ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8717½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8717¾ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8717 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8721 – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8721½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A

Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	8721 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8721½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8721 – Trabuco	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8721¼ – Trabuco	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8721½ – Trabuco	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8721¾ – Trabuco	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8722 – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8722½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8722 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8722½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8725 – North	Earth Tone Sheet Flooring	Kitchen	10 SF	80 SF	No	N/A	N/A
II-A	8725½ – North	Earth Tone Sheet Flooring	Bathroom	5 SF	35 SF	No	N/A	N/A
II-A	8725 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8725½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8726 – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8726½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A

Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	8726 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8726½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8731 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8731½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8731¾ – Trabuco	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8731½ – Trabuco	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8731¾ – Trabuco	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8731 – Trabuco	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8732 – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8732½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8732 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8732½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8733	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8733½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8735½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8735	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A

Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	8737	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8737½	Earth Tone Sheet Flooring	Kitchen	10 SF	80 SF	No	N/A	N/A
II-A	8739½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8739	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8741 – North	Earth Tone Sheet Flooring	Kitchen	5 SF	80 SF	No	N/A	N/A
II-A	8741 – North	Earth Tone Sheet Flooring	Bathroom	5 SF	35 SF	No	N/A	N/A
II-A	8741¼ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8741½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8741¾ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8741 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8741½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8742½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8742 – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8742¼ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8742¾ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8742½ – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A



Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	8742 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8743½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8743	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8745	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8745½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8746 – North	Earth Tone Sheet Flooring	Kitchen	5 SF	80 SF	No	N/A	N/A
II-A	8746¼ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8746½ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8746¾ – North	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8746 – South	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8746½ – South	Earth Tone Sheet Flooring	Kitchen	5 SF	80 SF	No	N/A	N/A
II-A	8747¼	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8747½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8747¾	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8747	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8751	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A

Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	8751½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8752½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8752	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8754	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8754½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8756	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8756½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8758½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8758¾	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8758	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8760½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8760	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8762½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8762	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8764	Earth Tone Sheet Flooring	Kitchen	5 SF	80 SF	No	N/A	N/A
II-A	8764½	Whitish/Brown Speckled Sheet Flooring	Kitchen	10 SF	80 SF	No	N/A	N/A

Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	8766½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8766	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	13922	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	13922½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	13942	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	13942½	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8646 – 8642 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8711 – 8715 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8712 – 8717 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8721 – 8733 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8722 – 8746 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8762 – 8758¾ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A

Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	Unmarked – Adjacent to 8737½ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8758½ – 8756 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8737½ – 8733½ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8731½ – 8725½ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8602½ – 8591½ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8746½ – 8732 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8715½ – 8691½ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8741 – 8766 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8671 – 8691 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8741½ – 8760 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8712 – 8717 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A

Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	8715½ – 8681½ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8743 – 8705½ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8712 – 13942½ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8601½ – 8641 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8611 – 8641½ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8721¼ – 8733¾ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8675½ – 8682½ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8675¼ – 8681 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8712½ – 8717 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8641½ – 8645 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8722½ – 8726½ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A

Table 15: Asbestos Evaluation for Buildings/Structures/Facilities Proposed for Reuse

Transfer Parcel	Unit No.	Damaged Material Type	Location	Damaged Quantity	Total Quantity	Previously Identified as ACM	Previously Identified as FAD ACM	Currently Identified as FAD ACM
II-A	8742½ – 8746½ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8752½ – 8754½ (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A
II-A	8726½ – 8726 (Garage)	No damaged suspect materials were identified in this unit.	N/A	N/A	N/A	N/A	N/A	N/A

Note: Most Building Numbers (other than those specifically identified as Trabuco) correspond to S.E. Midway Drive; where duplicate Building Numbers were found, they are identified with North or South (S.E. Midway Drive). Garages are identified such with the associated Units identified.

Buildings/Facilities on FOST property that are not listed in Tables 14 and 15 have not been previously surveyed.

<sup>(a)</sup> The 12-inch white floor tile in the main hall of Building 834 is currently identified as FAD ACM by assuming ACM and friability.

ACM = asbestos-containing material

FAD = friable and damaged

FOST = Finding of Suitability to Transfer

LF = linear feet

N/A = not applicable

SF = square feet

Source: Earth Tech 2003

Table 16a: Notifications and Restrictions Summary – Transfer Parcel Specific

Transfer Parcel	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material	Lead-Based Paint	Radon	School Site Considerations <sup>a</sup>
	Hazardous Substances (RFAs, TAAs, APHOs)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern							
I-A	5.2N	5.3N	5.4N	5.5N	5.6N	5.10N	5.7N	5.8N	5.9N	5.11N,R	5.12N,R	5.13N	5.1N
II-A	5.2N	5.3N	5.4N	5.5N	5.6N	5.10N		5.8N	5.9N	5.11N,R	5.12N,R	5.13N	5.1N
III-A	5.2N	5.3N	5.4N						5.9N	5.11N,R	5.12N,R	5.13N	5.1N
IV									5.9N			5.13N	5.1N

Notes: Table 16a provides a cross-reference to the notifications and restrictions sections in this FOST document (Section 5.1 through 5.13) corresponding to each transfer parcel. The 'N' or the 'R' indicate if it is a Notification or a Restriction.

<sup>a</sup> The location for potential school sites is currently unknown, therefore the notifications outlined in Section 5.1 may apply to all Transfer Parcels.

APHO = Aerial Photograph Features/Anomalies  
 AST = Aboveground Storage Tank  
 DRMO = Defense Reutilization and Marketing Office  
 FOST = Finding of Suitability to Transfer  
 N = Notification

R = Restriction  
 RFA = RCRA Facility Assessment  
 TAA = Temporary Accumulation Area  
 UST = Underground Storage Tank

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/ Structure/ Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
Transfer Parcel I-A													
I-A	3										5.11(d)	5.12N,R(a)	5.13N
I-A	4										5.11(d)	5.12N,R(a)	5.13N
I-A	8										5.11(d)	5.12N,R(a)	5.13N
I-A	9	5.2N									5.11(d)	5.12N,R(a)	5.13N
I-A	10	5.2N									5.11N,R(b)	5.12N,R(a)	5.13N
I-A	11			5.4N							5.11N,R(c)	5.12N,R(a)	5.13N
I-A	12			5.4N		5.6N					5.11N,R(c)	5.12N,R(a)	5.13N
I-A	13			5.4N							5.11N,R(c)	5.12N,R(a)	5.13N
I-A	14	5.2N		5.4N							5.11(d)	5.12N,R(a)	5.13N
I-A	15	5.2N									5.11N,R(b)	5.12N,R(a)	5.13N
I-A	16										5.11(d)	5.12N,R(a)	5.13N
I-A	17										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	19					5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
I-A	20										5.11(d)	5.12N,R(a)	5.13N
I-A	21										5.11(d)	5.12N,R(a)	5.13N
I-A	23										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	44 <sup>1</sup>			5.4N									
I-A	45 <sup>1</sup>			5.4N									



Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Materials <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
I-A	48										5.11(d)	5.12N,R(a)	5.13N
I-A	49										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	50	5.2N									5.11N,R(b)	5.12N,R(a)	5.13N
I-A	52	5.2N									5.11N,R(c)	5.12N,R(a)	5.13N
I-A	53			5.4N							5.11(d)	5.12N,R(a)	5.13N
I-A	54			5.4N							5.11(d)	5.12N,R(a)	5.13N
I-A	55 <sup>1</sup>			5.4N									
I-A	56			5.4N		5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
I-A	57			5.4N							5.11N,R(a)	5.12N,R(a)	5.13N
I-A	58			5.4N		5.6N					5.11N,R(a)	5.12N,R(a)	5.13N
I-A	59			5.4N		5.6N					5.11(d)	5.12N,R(a)	5.13N
I-A	60			5.4N		5.6N					5.11N,R(c)	5.12N,R(a)	5.13N
I-A	61 <sup>1</sup>												
I-A	62 <sup>1</sup>			5.4N									
I-A	63 <sup>1</sup>			5.4N									
I-A	66			5.4N							5.11N,R(a)	5.12N,R(a)	5.13N
I-A	67 <sup>1</sup>			5.4N									
I-A	69 <sup>1</sup>			5.4N									
I-A	71 <sup>1</sup>			5.4N									
I-A	73 <sup>1</sup>			5.4N									

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Materials <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
I-A	74 <sup>1</sup>			5.4N									
I-A	77	5.2N		5.4N							5.11N,R(a)	5.12N,R(a)	5.13N
I-A	78 <sup>1</sup>			5.4N									
I-A	79 <sup>1</sup>			5.4N									
I-A	80 <sup>1</sup>			5.4N									
I-A	81 <sup>1</sup>			5.4N									
I-A	82 <sup>1</sup>			5.4N									
I-A	83			5.4N							5.11N,R(c)	5.12N,R(a)	5.13N
I-A	84 <sup>1</sup>			5.4N									
I-A	94			5.4N							5.11N,R(a)	5.12N,R(a)	5.13N
I-A	99										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	101 <sup>1</sup>												
I-A	146			5.4N							5.11(d)	5.12N,R(a)	5.13N
I-A	147			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
I-A	152										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	188 <sup>1</sup>			5.4N									
I-A	189 <sup>1</sup>			5.4N									
I-A	190 <sup>1</sup>			5.4N									
I-A	191 <sup>1</sup>			5.4N									
I-A	192 <sup>1</sup>			5.4N									

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
I-A	193 <sup>1</sup>			5.4N									
I-A	194 <sup>1</sup>			5.4N									
I-A	195 <sup>1</sup>			5.4N									
I-A	219 <sup>1</sup>			5.4N									
I-A	220 <sup>1</sup>			5.4N									
I-A	221 <sup>1</sup>			5.4N									
I-A	252 <sup>1</sup>			5.4N									
I-A	253 <sup>1</sup>			5.4N									
I-A	255 <sup>1</sup>			5.4N									
I-A	256	5.2N		5.4N							5.11N,R(c)	5.12N,R(a)	5.13N
I-A	257			5.4N							5.11N,R(c)	5.12N,R(a)	5.13N
I-A	258 <sup>1</sup>			5.4N									
I-A	259 <sup>1</sup>												
I-A	260 <sup>1</sup>			5.4N									
I-A	262 <sup>1</sup>	5.2N		5.4N									
I-A	263			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
I-A	264			5.4N		5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
I-A	265 <sup>1</sup>			5.4N									
I-A	266 <sup>1</sup>			5.4N									
I-A	267 <sup>1</sup>			5.4N									

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordinance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
I-A	268 <sup>1</sup>			5.4N									
I-A	269 <sup>1</sup>			5.4N									
I-A	270 <sup>1</sup>			5.4N									
I-A	271			5.4N		5.6N					5.11N,R(c)	5.12N,R(a)	5.13N
I-A	272			5.4N		5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
I-A	273			5.4N							5.11(d)	5.12N,R(a)	5.13N
I-A	274 <sup>1</sup>			5.4N									
I-A	275			5.4N							5.11N,R(a)	5.12N,R(a)	5.13N
I-A	276			5.4N							5.11N,R(a)	5.12N,R(a)	5.13N
I-A	277			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
I-A	278 <sup>1</sup>			5.4N									
I-A	279	5.2N		5.4N							5.11(d)	5.12N,R(a)	5.13N
I-A	280			5.4N	5.5N						5.11N,R(b)	5.12N,R(a)	5.13N
I-A	281 <sup>1</sup>			5.4N		5.6N							
I-A	282 <sup>1</sup>			5.4N									
I-A	283 <sup>1</sup>			5.4N									
I-A	284 <sup>1</sup>			5.4N									
I-A	285			5.4N		5.6N					5.11N,R(c)	5.12N,R(a)	5.13N
I-A	286 <sup>1</sup>	5.2N											
I-A	288			5.4N							5.11N,R(a)	5.12N,R(a)	5.13N
I-A	289	5.2N									5.11N,R(c)	5.12N,R(a)	5.13N

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
I-A	327 <sup>1</sup>			5.4N		5.6N							
I-A	328			5.4N							5.11N,R(a)	5.12N,R(a)	5.13N
I-A	329			5.4N							5.11N,R(a)	5.12N,R(a)	5.13N
I-A	337 <sup>1</sup>			5.4N									
I-A	347			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
I-A	365 <sup>1</sup>			5.4N		5.6N							
I-A	366			5.4N							5.11N,R(a)	5.12N,R(a)	5.13N
I-A	376			5.4N							5.11N,R(c)	5.12N,R(a)	5.13N
I-A	382					5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
I-A	410					5.6N					5.11(d)	5.12N,R(b)	5.13N
I-A	418 <sup>1</sup>			5.4N									
I-A	422										5.11(d)	5.12N,R(b)	5.13N
I-A	427										5.11(d)	5.12N,R(b)	5.13N
I-A	430										5.11(d)	5.12N,R(b)	5.13N
I-A	432										5.11(d)	5.12N,R(b)	5.13N
I-A	449			5.4N		5.6N					5.11N,R(a)	5.12N,R(a)	5.13N
I-A	450			5.4N		5.6N					5.11N,R(a)	5.12N,R(a)	5.13N
I-A	451			5.4N		5.6N					5.11N,R(a)	5.12N,R(a)	5.13N
I-A	452			5.4N		5.6N					5.11N,R(a)	5.12N,R(a)	5.13N
I-A	471										5.11N,R(c)	5.12N,R(a)	5.13N

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
I-A	472										5.11(d)	5.12N,R(a)	5.13N
I-A	475										5.11(d)	5.12N,R(a)	5.13N
I-A	523										5.11(d)	5.12N,R(a)	5.13N
I-A	578										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	584		5.3N								5.11N,R(b)	5.12N,R(a)	5.13N
I-A	600										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	601	5.2N			5.5N						5.11N,R(b)	5.12N,R(a)	5.13N
I-A	615										5.11(d)	5.12N,R(a)	5.13N
I-A	624	5.2N									5.11N,R(c)	5.12N,R(a)	5.13N
I-A	625		5.3N	5.4N			5.10N				5.11(d)	5.12N,R(a)	5.13N
I-A	626	5.2N	5.3N		5.5N						5.11(d)	5.12N,R(a)	5.13N
I-A	629										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	630 <sup>1</sup>					5.6N							
I-A	656										5.11(d)	5.12N,R(a)	5.13N
I-A	657										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	660										5.11N,R(a)	5.12N,R(a)	5.13N
I-A	661										5.11N,R(a)	5.12N,R(a)	5.13N
I-A	662			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
I-A	666										5.11N,R(a)	5.12N,R(a)	5.13N
I-A	667										5.11N,R(a)	5.12N,R(a)	5.13N
I-A	668										5.11N,R(a)	5.12N,R(a)	5.13N

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
I-A	669										5.11N,R(a)	5.12N,R(a)	5.13N
I-A	670 <sup>1</sup>		5.3N	5.4N									
I-A	681										5.11(d)	5.12N,R(b)	5.13N
I-A	683										5.11N,R(c)	5.12N,R(a)	5.13N
I-A	684										5.11(d)	5.12N,R(a)	5.13N
I-A	685										5.11(d)	5.12N,R(a)	5.13N
I-A	687	5.2N			5.5N	5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
I-A	692 <sup>1</sup>	5.2N				5.6N							
I-A	694										5.11N,R(c)	5.12N,R(a)	5.13N
I-A	702		5.3N								5.11N,R(b)	5.12N,R(a)	5.13N
I-A	703										5.11(d)	5.12N,R(b)	5.13N
I-A	704										5.11(d)	5.12N,R(b)	5.13N
I-A	707										5.11(d)	5.12N,R(b)	5.13N
I-A	729										5.11N,R(b)	5.12N,R(b)	5.13N
I-A	730			5.4N							5.11N,R(c)	5.12N,R(b)	5.13N
I-A	731										5.11N,R(b)	5.12N,R(b)	5.13N
I-A	732										5.11N,R(b)	5.12N,R(b)	5.13N
I-A	733			5.4N		5.6N					5.11N,R(b)	5.12N,R(b)	5.13N
I-A	736										5.11N,R(b)	5.12N,R(b)	5.13N
I-A	739										5.11(d)	5.12N,R(b)	5.13N

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Materials <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
I-A	740										5.11N,R(b)	5.12N,R(b)	5.13N
I-A	741										5.11N,R(b)	5.12N,R(b)	5.13N
I-A	744	5.2N			5.5N				5.8N		5.11(d)	5.12N,R(b)	5.13N
I-A	757										5.11N,R(b)	5.12N,R(b)	5.13N
I-A	766	5.2N		5.4N	5.5N						5.11N,R(b)	5.12N,R(b)	5.13N
I-A	773		5.3N								5.11(d)	5.12N,R(b)	5.13N
I-A	774										5.11(d)	5.12N,R(b)	5.13N
I-A	775										5.11(d)	5.12N,R(b)	5.13N
I-A	776										5.11(d)	5.12N,R(b)	5.13N
I-A	777										5.11(d)	5.12N,R(b)	5.13N
I-A	788 <sup>1</sup>												
I-A	793										5.11(d)	5.12N,R(b)	5.13N
I-A	794								5.8N		5.11N,R(b)	5.12N,R(b)	5.13N
I-A	797			5.4N							5.11(d)	5.12N,R(a)	5.13N
I-A	799										5.11N,R(c)	5.12N,R(b)	5.13N
I-A	823										5.11(d)	5.12N,R(b)	5.13N
I-A	829										5.11(d)	5.12N,R(b)	5.13N
I-A	833					5.6N					5.11(d)	5.12N,R(b)	5.13N
I-A	837 <sup>1</sup>												
I-A	839										5.11(d)	5.12N,R(b)	5.13N
I-A	842										5.11(d)	5.12N,R(b)	5.13N



Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
I-A	844										5.11N,R(b)	5.12N,R(b)	5.13N
I-A	852										5.11(d)	5.12N,R(b)	5.13N
I-A	863										5.11N,R(b)	5.12N,R(b)	5.13N
I-A	864										5.11N,R(b)	5.12N,R(b)	5.13N
I-A	873										5.11(d)	5.12N,R(b)	5.13N
I-A	874										5.11(d)	5.12N,R(a)	5.13N
I-A	876							5.7N			5.11(d)	5.12N,R(b)	5.13N
I-A	890										5.11N,R(b)	5.12N,R(b)	5.13N
I-A	894										5.11(d)	5.12N,R(a)	5.13N
I-A	896				5.5N						5.11N,R(b)	5.12N,R(b)	5.13N
I-A	898										5.11N,R(b)	5.12N,R(b)	5.13N
I-A	899										5.11(d)	5.12N,R(b)	5.13N
I-A	929										5.11(d)	5.12N,R(b)	5.13N
I-A	941										5.11(d)	5.12N,R(a)	5.13N
I-A	944										5.11(d)	5.12N,R(a)	5.13N
I-A	955										5.11(d)	5.12N,R(a)	5.13N
I-A	956										5.11(d)	5.12N,R(a)	5.13N
I-A	957										5.11(d)	5.12N,R(a)	5.13N
I-A	958										5.11(d)	5.12N,R(a)	5.13N
I-A	959										5.11(d)	5.12N,R(a)	5.13N

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
I-A	960										5.11(d)	5.12N,R(a)	5.13N
I-A	968 <sup>1</sup>												
I-A	969										5.11(d)	5.12N,R(a)	5.13N
I-A	970										5.11(d)	5.12N,R(a)	5.13N
I-A	971										5.11(d)	5.12N,R(a)	5.13N
I-A	1524 <sup>1</sup>												
I-A	1646 <sup>1</sup>												
I-A	1702				5.5N						5.11N,R(b)	5.12N,R(a)	5.13N
I-A	1815										5.11(d)	5.12N,R(b)	5.13N
I-A	5101										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	5102			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
I-A	5103										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	5104										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	5105										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	Saddleback Terrace Housing Area <sup>2</sup>										5.11N,R(b)	5.12N,R(a)	5.13N
I-A	Bordier's Nursery <sup>3</sup>	5.2N								5.9N			
I-A	DRMO Yard 3 <sup>3</sup>	5.2N											

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
I-A	Tank Farm No. 3 <sup>3</sup>	5.2N											
I-A	Perimeter Road & Magazine Road <sup>3</sup>	5.2N											
I-A	MSC W1 and MSC W2						5.10N						
Transfer Parcel II-A													
II-A	117 <sup>1</sup>												
II-A	120	5.2N				5.6N					5.11N,R(c)	5.12N,R(a)	5.13N
II-A	121	5.2N <sup>4</sup>									5.11N,R(c)	5.12N,R(a)	5.13N
II-A	122										5.11N,R(c)	5.12N,R(a)	5.13N
II-A	123										5.11N,R(c)	5.12N,R(a)	5.13N
II-A	129					5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
II-A	132										5.11(d)	5.12N,R(a)	5.13N
II-A	134										5.11N,R(c)	5.12N,R(a)	5.13N
II-A	135										5.11N,R(c)	5.12N,R(a)	5.13N
II-A	136	5.2N							5.8N		5.11(d)	5.12N,R(a)	5.13N
II-A	137	5.2N									5.11N,R(b)	5.12N,R(a)	5.13N
II-A	138	5.2N		5.4N		5.6N					5.11N,R(a)	5.12N,R(a)	5.13N
II-A	141 <sup>1</sup>								5.8N				

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Materials <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
II-A	142										5.11(d)	5.12N,R(a)	5.13N
II-A	160 <sup>1</sup>								5.8N				
II-A	161 <sup>1</sup>								5.8N				
II-A	162 <sup>1</sup>								5.8N				
II-A	163	5.2N							5.8N		5.11(d)	5.12N,R(a)	5.13N
II-A	164								5.8N		5.11(d)	5.12N,R(a)	5.13N
II-A	165					5.6N					5.11(d)	5.12N,R(a)	5.13N
II-A	166								5.8N		5.11(d)	5.12N,R(a)	5.13N
II-A	167								5.8N		5.11(d)	5.12N,R(a)	5.13N
II-A	168 <sup>1</sup>								5.8N				
II-A	169								5.8N		5.11(d)	5.12N,R(a)	5.13N
II-A	170								5.8N		5.11(d)	5.12N,R(a)	5.13N
II-A	171								5.8N		5.11(d)	5.12N,R(a)	5.13N
II-A	172								5.8N		5.11(d)	5.12N,R(a)	5.13N
II-A	173 <sup>1</sup>								5.8N				
II-A	196 <sup>1</sup>			5.4N									
II-A	197 <sup>1</sup>			5.4N									
II-A	198 <sup>1</sup>			5.4N									
II-A	199 <sup>1</sup>			5.4N									
II-A	200 <sup>1</sup>			5.4N									

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Materials <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
II-A	201 <sup>1</sup>			5.4N									
II-A	202 <sup>1</sup>			5.4N									
II-A	203 <sup>1</sup>			5.4N		5.6N							
II-A	216 <sup>1</sup>			5.4N									
II-A	217 <sup>1</sup>			5.4N									
II-A	218 <sup>1</sup>			5.4N									
II-A	290										5.11(d)	5.12N,R(a)	5.13N
II-A	291	5.2N							5.8N		5.11N,R(b)	5.12N,R(a)	5.13N
II-A	292			5.4N									
II-A	293										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	294 <sup>1</sup>	5.2N											
II-A	341										5.11(d)	5.12N,R(a)	5.13N
II-A	343 <sup>1</sup>	5.2N											
II-A	371				5.5N	5.6N					5.11N,R(c)	5.12N,R(a)	5.13N
II-A	378 <sup>1</sup>		5.3N										
II-A	381 <sup>1</sup>	5.2N											
II-A	384					5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
II-A	389	5.2N									5.11(d)	5.12N,R(a)	5.13N
II-A	391										5.11(d)	5.12N,R(a)	5.13N
II-A	397 <sup>1</sup>												

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
II-A	402										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	403 <sup>1</sup>												
II-A	404			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	405			5.4N							5.11N,R(a)	5.12N,R(b)	5.13N
II-A	406			5.4N		5.6N					5.11N,R(a)	5.12N,R(a)	5.13N
II-A	407										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	408										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	409										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	414					5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
II-A	415	5.2N				5.6N					5.11N,R(c)	5.12N,R(a)	5.13N
II-A	416										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	440								5.8N		5.11(d)	5.12N,R(a)	5.13N
II-A	441	5.2N									5.11N,R(a)	5.12N,R(a)	5.13N
II-A	453			5.4N							5.11N,R(c)	5.12N,R(a)	5.13N
II-A	454	5.2N		5.4N							5.11N,R(c)	5.12N,R(a)	5.13N
II-A	455			5.4N							5.11N,R(c)	5.12N,R(a)	5.13N
II-A	456										5.11N,R(c)	5.12N,R(a)	5.13N
II-A	458		5.3N			5.6N					5.11(d)	5.12N,R(a)	5.13N
II-A	459	5.2N									5.11N,R(b)	5.12N,R(a)	5.13N
II-A	460					5.6N					5.11N,R(b)	5.12N,R(a)	5.13N

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
II-A	461	5.2N		5.4N	5.5N						5.13N,R(c)	5.12N,R(a)	5.13N
II-A	462	5.2N		5.4N	5.5N						5.13N,R(b)	5.12(a)N	5.13N
II-A	463	5.2N		5.4N	5.5N						5.13N,R(c)	5.12(a)N	5.13N
II-A	464	5.2N		5.4N		5.6N	5.10N				5.11N,R(c)	5.12N,R(a)	5.13N
II-A	469										5.11(d)	5.12N,R(a)	5.13N
II-A	579			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	581			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	582					5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
II-A	602										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	607										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	610			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	611								5.8N		5.11(d)	5.12N,R(a)	5.13N
II-A	614										5.11(d)	5.12N,R(a)	5.13N
II-A	619			5.4N		5.6N					5.11N,R(c)	5.12N,R(a)	5.13N
II-A	627			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	628										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	636	5.2N		5.4N		5.6N					5.11N,R(a)	5.12N,R(a)	5.13N
II-A	638										5.11(d)	5.12N,R(a)	5.13N
II-A	645										5.11(d)	5.12N,R(a)	5.13N
II-A	664					5.6N					5.11(d)	5.12N,R(a)	5.13N

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
II-A	665										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	676										5.11(d)	5.12N,R(a)	5.13N
II-A	678										5.11(d)	5.12N,R(a)	5.13N
II-A	679										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	680										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	686										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	706 <sup>1</sup>			5.4N									
II-A	708										5.11(d)	5.12N,R(a)	5.13N
II-A	711					5.6N					5.11(d)	5.12N,R(b)	5.13N
II-A	713										5.11(d)	5.12N,R(a)	5.13N
II-A	714										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	715										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	722										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	727		5.3N								5.11N,R(b)	5.12N,R(b)	5.13N
II-A	728										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	737										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	755										5.11(d)	5.12N,R(b)	5.13N
II-A	756										5.11(d)	5.12N,R(b)	5.13N
II-A	762			5.4N	5.5N						5.11N,R(b)	5.12N,R(b)	5.13N
II-A	782			5.4N							5.11(d)	5.12N,R(b)	5.13N



Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
II-A	784										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	785										5.11(d)	5.12N,R(b)	5.13N
II-A	786										5.11(d)	5.12N,R(b)	5.13N
II-A	790										5.11(d)	5.12N,R(b)	5.13N
II-A	792										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	816										5.11(d)	5.12N,R(b)	5.13N
II-A	817	5.2N			5.5N					5.9N	5.11N,R(b)	5.12N,R(b)	5.13N
II-A	826								5.8N		5.11N,R(b)	5.12N,R(b)	5.13N
II-A	828										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	831										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	834										5.11N,R(a)	5.12N,R(b)	5.13N
II-A	835										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	840										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	841	5.2N							5.8N		5.11N,R(b)	5.12N,R(a)	5.13N
II-A	845	5.2N			5.5N						5.11N,R(b)	5.12N,R(b)	5.13N
II-A	847										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	848										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	849										5.11(d)	5.12N,R(b)	5.13N
II-A	854										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	855										5.11N,R(b)	5.12N,R(a)	5.13N

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
II-A	856	5.2N									5.11N,R(b)	5.12N,R(b)	5.13N
II-A	868										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	869										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	870										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	871										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	872										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	881										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	882										5.11(d)	5.12N,R(b)	5.13N
II-A	883			5.4N							5.11N,R(b)	5.12N,R(b)	5.13N
II-A	884										5.11(d)	5.12N,R(b)	5.13N
II-A	885										5.11N,R(b)	5.12N,R(b)	5.13N
II-A	895										5.11(d)	5.12N,R(b)	5.13N
II-A	901										5.11(d)	5.12N,R(b)	5.13N
II-A	916	5.2N									5.11(d)	5.12N,R(b)	5.13N
II-A	917	5.2N									5.11(d)	5.12N,R(b)	5.13N
II-A	922										5.11(d)	5.12N,R(b)	5.13N
II-A	927										5.11(d)	5.12N,R(b)	5.13N
II-A	931										5.11(d)	5.12N,R(a)	5.13N
II-A	934										5.11(d)	5.12N,R(a)	5.13N
II-A	935										5.11(d)	5.12N,R(a)	5.13N

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
II-A	951										5.11(d)	5.12N,R(a)	5.13N
II-A	953										5.11(d)	5.12N,R(a)	5.13N
II-A	954										5.11(d)	5.12N,R(a)	5.13N
II-A	961										5.11(d)	5.12N,R(a)	5.13N
II-A	964										5.11(d)	5.12N,R(a)	5.13N
II-A	1538										5.11(d)	5.12N,R(a)	5.13N
II-A	1650										5.11(d)	5.12N,R(a)	5.13N
II-A	1670 <sup>1</sup>												
II-A	1687 <sup>1</sup>						5.10N			5.9N			
II-A	1700 <sup>1</sup>	5.2N											
II-A	1721										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	1774										5.11(d)	5.12N,R(a)	5.13N
II-A	1787										5.11(d)	5.12N,R(a)	5.13N
II-A	1791										5.11(d)	5.12N,R(a)	5.13N
II-A	1798	5.2N									5.11N,R(b)	5.12N,R(a)	5.13N
II-A	1809 <sup>1</sup>												
II-A	1814 <sup>1</sup>												
II-A	5014					5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5201			5.4N		5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5202			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Materials <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
II-A	5203			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5204			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5205			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5206			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5207			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5208			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5209			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5210 <sup>1</sup>			5.4N									
II-A	5211 <sup>1</sup>			5.4N									
II-A	5212 <sup>1</sup>			5.4N									
II-A	5213			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5214			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5215			5.4N		5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5216			5.4N		5.6N					5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5217			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5218			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5219			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5220 <sup>1</sup>			5.4N									
II-A	5221 <sup>1</sup>			5.4N									
II-A	5222 <sup>1</sup>			5.4N									
II-A	5223 <sup>1</sup>			5.4N									
II-A	5224			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Materials <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
II-A	5225			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5226			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5227			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5228			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5229			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5230			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5231			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5232			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5233			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5234			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5235			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5236			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5237 <sup>1</sup>			5.4N									
II-A	5238 <sup>1</sup>			5.4N									
II-A	5239			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5240 <sup>1</sup>			5.4N		5.6N							
II-A	5241			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5242			5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
II-A	5417 <sup>1</sup>					5.6N							
II-A	T-2 <sup>1</sup>			5.4N									
II-A	T-3 <sup>1</sup>			5.4N									
II-A	T-10 <sup>1</sup>			5.4N									

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
II-A	Golf Course <sup>3</sup>	5.2N											
II-A	DRMO Storage Yard No.2 <sup>3</sup>	5.2N											
II-A	San Joaquin Housing <sup>2</sup>										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	Vista Terrace Housing <sup>2</sup>										5.11N,R(b)	5.12N,R(a)	5.13N
II-A	Wherry Housing <sup>2</sup>										5.11N,R(a,b,c) & 5.11(d)	5.12N,R(a)	5.13N
II-A	Runways 34L & 34R <sup>3</sup>	5.2N											
II-A	Horse Stables <sup>3</sup>	5.2N											
II-A	14 <sup>th</sup> Street & S Street <sup>3</sup>	5.2N											
II-A	Q Street & 9 <sup>th</sup> Street <sup>3</sup>	5.2N											
II-A	APHO 95	5.2N											

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
II-A	Tank Farm 4 <sup>3</sup>	5.2N											
II-A	IRP Site 19 <sup>3</sup>						5.10N						
II-A	Agricultural Areas <sup>3</sup>									5.9N			
Transfer Parcel III-A													
III-A	24 <sup>1</sup>			5.4N									
III-A	25 <sup>1</sup>												
III-A	27										5.11(d)	5.12N,R(a)	5.13N
III-A	37 <sup>1</sup>												
III-A	38	5.2N		5.4N							5.11N,R(b)	5.12N,R(a)	5.13N
III-A	39 <sup>1</sup>			5.4N									
III-A	40 <sup>1</sup>			5.4N									
III-A	41 <sup>1</sup>			5.4N									
III-A	42 <sup>1</sup>			5.4N									
III-A	43 <sup>1</sup>			5.4N									
III-A	241			5.4N							5.11N,R(c)	5.12N,R(a)	5.13N
III-A	251			5.4N							5.11N,R(c)	5.12N,R(a)	5.13N
III-A	421										5.11(d)	5.12N,R(a)	5.13N
III-A	519										5.11(d)	5.12N,R(a)	5.13N

Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels

Transfer Parcel	Building/Structure/Facility	Locations of Concern						Medical/Biohazardous Waste	Ordnance	Pesticides	Asbestos-Containing Material <sup>5</sup>	Lead-Based Paint	Radon
		Hazardous Substances (RFAs, TAAs, APHOS)	Installation Restoration Program Sites	ASTs and USTs	Wastewater Treatment and Related Systems	Polychlorinated Biphenyls	Miscellaneous Locations of Concern						
III-A	520										5.11(d)	5.12N,R(a)	5.13N
III-A	942										5.11(d)	5.12N,R(b)	5.13N
III-A	Portion of IRP Site 13 <sup>3</sup>		5.3N										
III-A	Agua Chiron Wash <sup>3</sup>	5.2N											
III-A	Agricultural Areas <sup>3</sup>									5.9N			
Transfer Parcel IV													
IV	Agricultural Areas <sup>3</sup>									5.9N			5.13N
Station-wide													
Station-wide	Active Sanitary Sewer Lines <sup>3</sup>	5.2N											
Station-wide	Irrigation Pipeline <sup>3</sup>	5.2N											

## Notes:

Table 16b provides a cross-reference to the notifications and restrictions sections in this FOST document (Sections 5.1 through 5.13) corresponding to buildings/structures/facilities located (or were located if demolished) in each transfer parcel. The 'N' or the 'R' indicate if it is a Notification or a Restriction.

<sup>1</sup> These buildings/structures/facilities have been demolished or removed.

<sup>2</sup> These areas are associated with multiple housing units (each unit with a unique identification number).

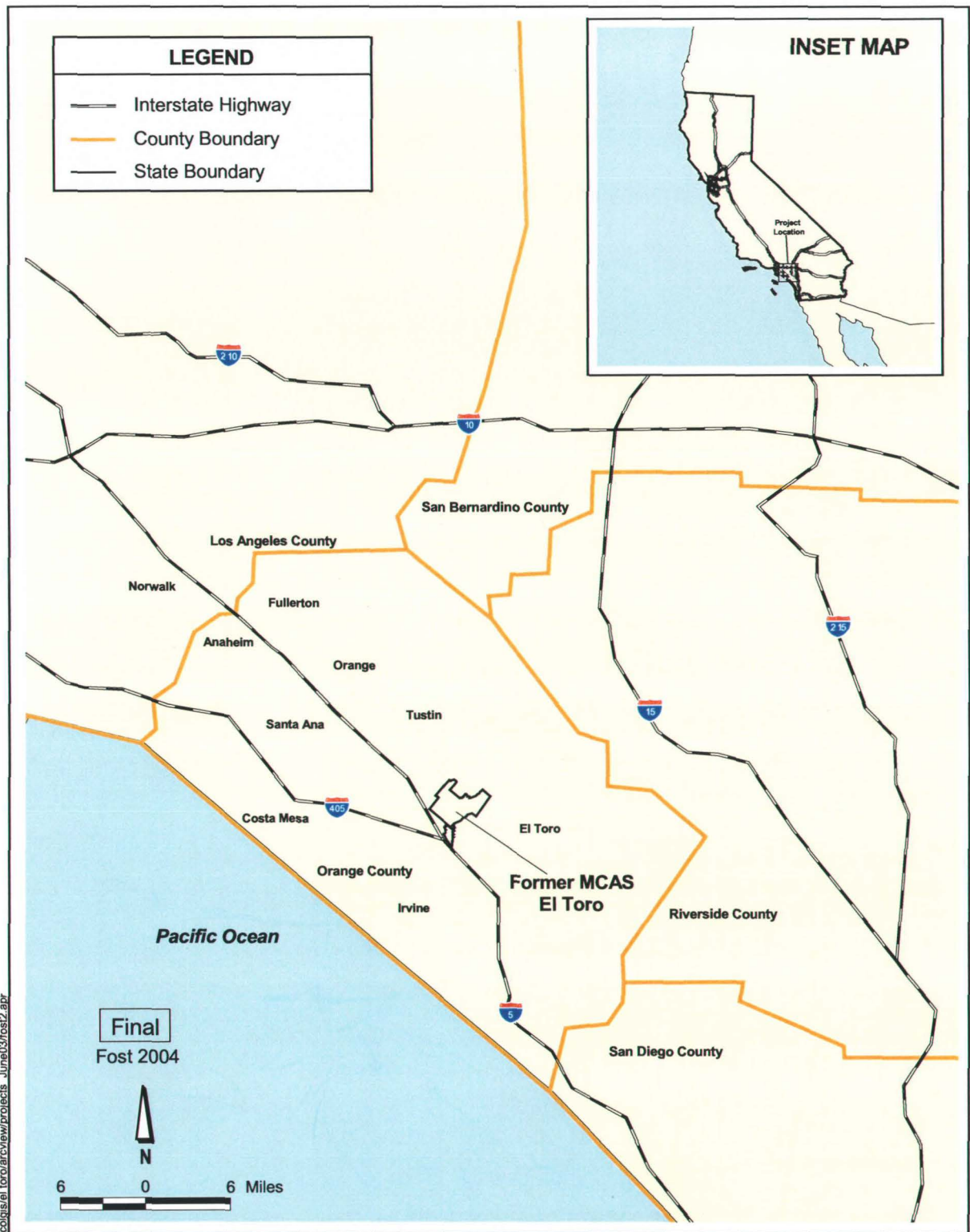


<sup>3</sup> These facilities/areas are not discrete buildings/structures with a unique identification number and are listed here due to their association with LOCs and/or other environmental concerns (and corresponding notifications/restrictions).

<sup>4</sup> Building 121 is the nearest building to APHO 110 which has been assigned an ECP Category 7 (restriction) until NFA concurrence is obtained from DTSC.

<sup>5</sup> For ACM, subsection 5.11(d) is the category of buildings/structures/facilities where no ACM was found and consequently no associated restriction. For these cases, a reference to 5.11(d) is made without the 'R'.

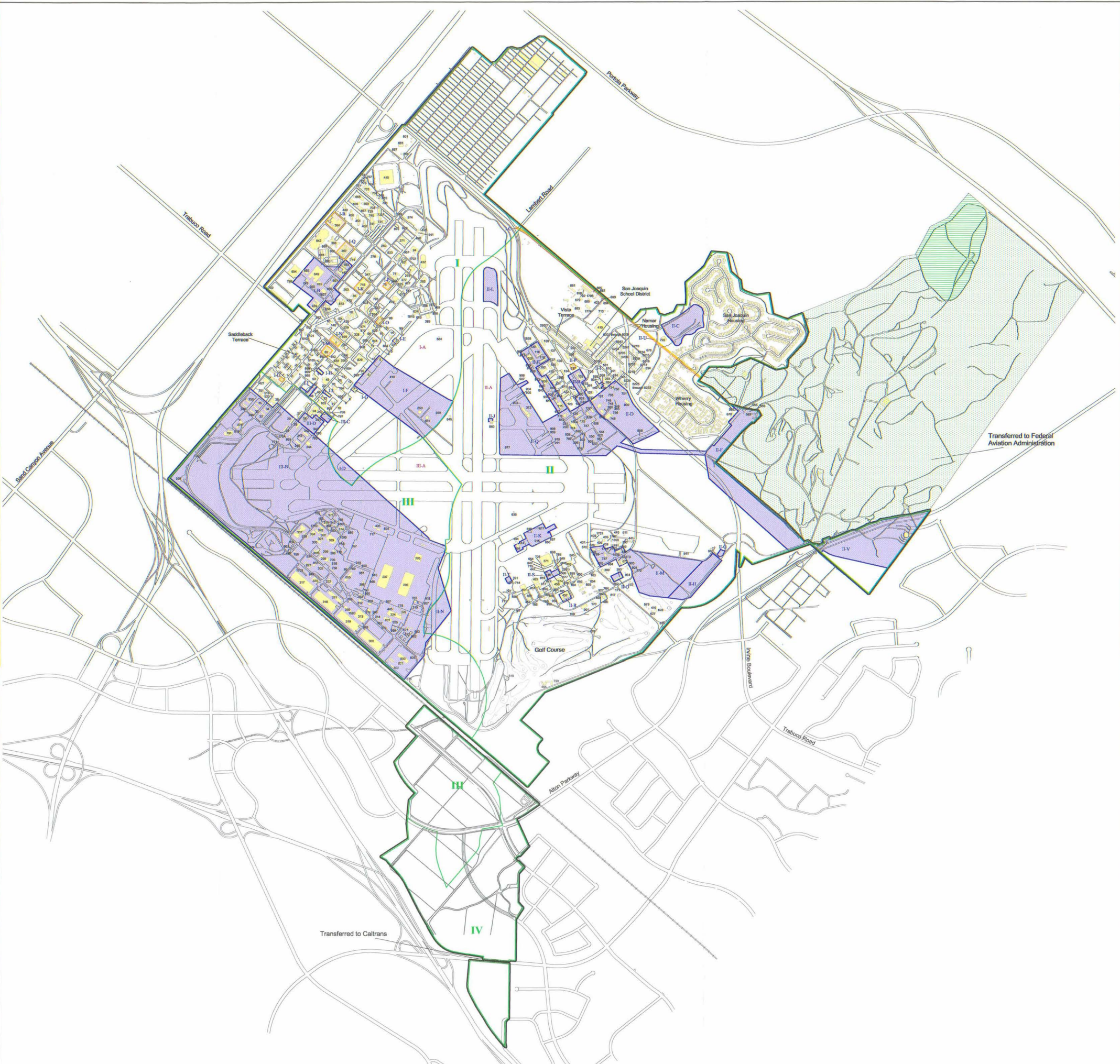
APHO = Aerial Photograph Features/Anomalies  
AST = Aboveground Storage Tank  
DRMO = Defense Reutilization Marketing Office  
IRP = Installation Restoration Program  
LOC = Location of Concern  
MSC = Miscellaneous  
N = Notification  
R = Restriction  
RFA = RCRA Facility Assessment  
TAA = Temporary Accumulation Area  
UST = Underground Storage Tank



**VICINITY MAP  
FINDING OF SUITABILITY TO TRANSFER  
FORMER MCAS EL TORO  
CALIFORNIA**

**Figure  
1**





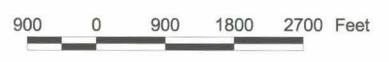
**LEGEND**

- Property Boundary
- Roads
- Navy Sale Parcel Boundary
- III Navy Sale Parcel Number
- Areas Suitable for Lease (Carve-Outs)
- Transfer Parcel Number (Parcel IV in entirety is suitable for Transfer)
- III-A
- Areas Suitable for Transfer
- III-B Carve-Out Number
- Petroleum Carve-Out
- Transferred Parcel
- Building/Facility
- 296 Building/Facility Number
- Navy property addressed in a Site-specific EBS

**SOURCE**

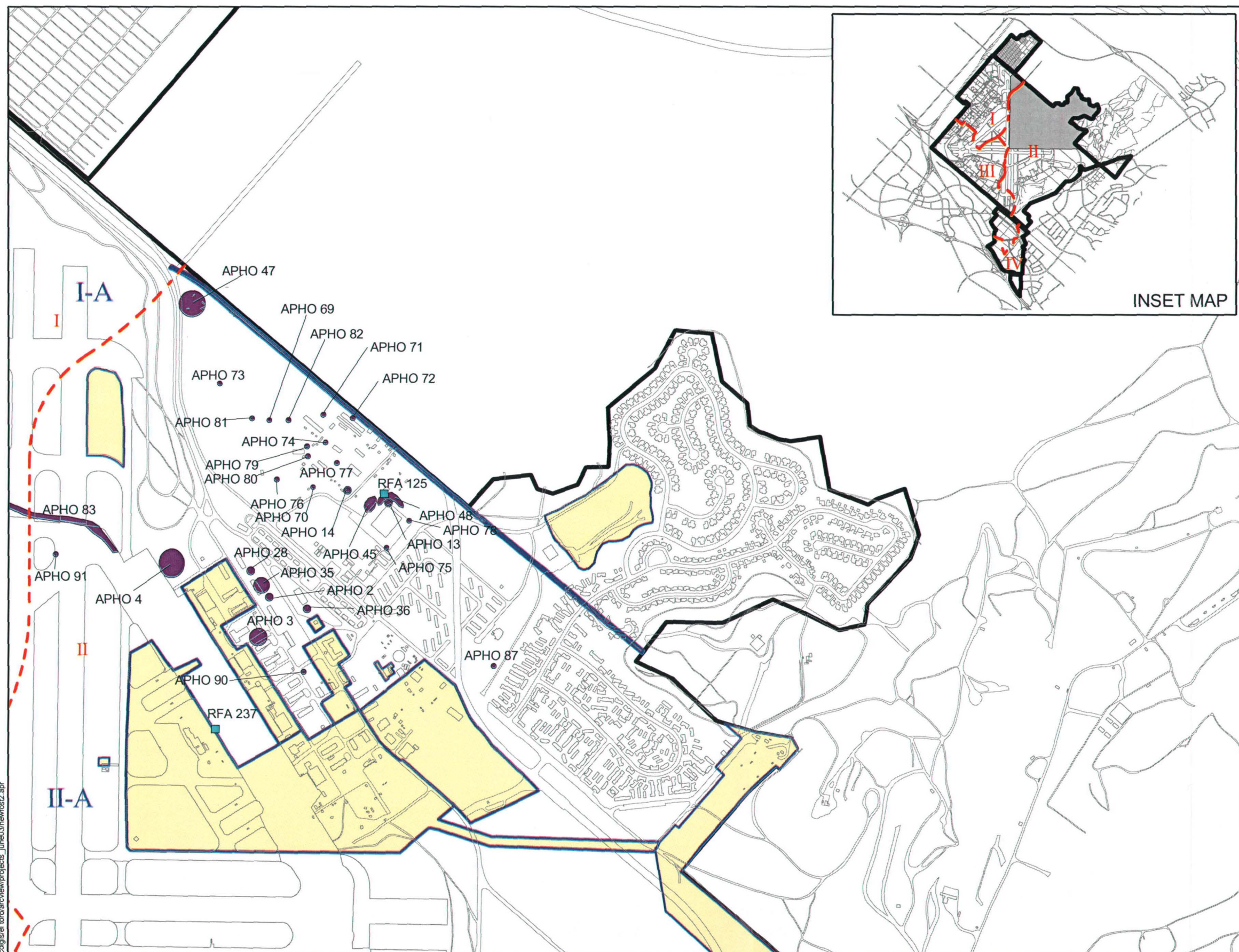
Final Environmental Baseline Survey,  
Former Marine Corps Air Station  
El Toro, California. Earth Tech 2003.

Final  
July 2004



**FIGURE 2**  
**Buildings / Structures / Facilities**  
**Within Transferable Parcels**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**





### LEGEND

- |   |  |
|---|--|
|  | Property Boundary                            |
|  | Roads  |
|  | Buildings                                    |
|  | Navy Sale Parcel Boundary                    |
|  | Navy Sale Parcel Number                      |
|  | Transferable Area                            |
|  | Carve-Out (Non-Transferable Area)            |
|  | Transfer Parcel Number                       |
|  | Aerial Photograph Anomaly Areas (APHO Sites) |
|  | RCRA Facility Assessment (RFA) Site          |

## NOTES

RFA 12 has been identified as the basewide sanitary sewer system and is therefore not shown. RFA 247 has been identified as the pipeline which transferred water from the former sewage treatment plant (SW) to the golf course irrigation storage tank (SE) and is therefore not shown.

## SOURCE

Final Environmental Baseline Survey,  
Former Marine Corps Air Station  
El Toro, California. Earth Tech 2003.

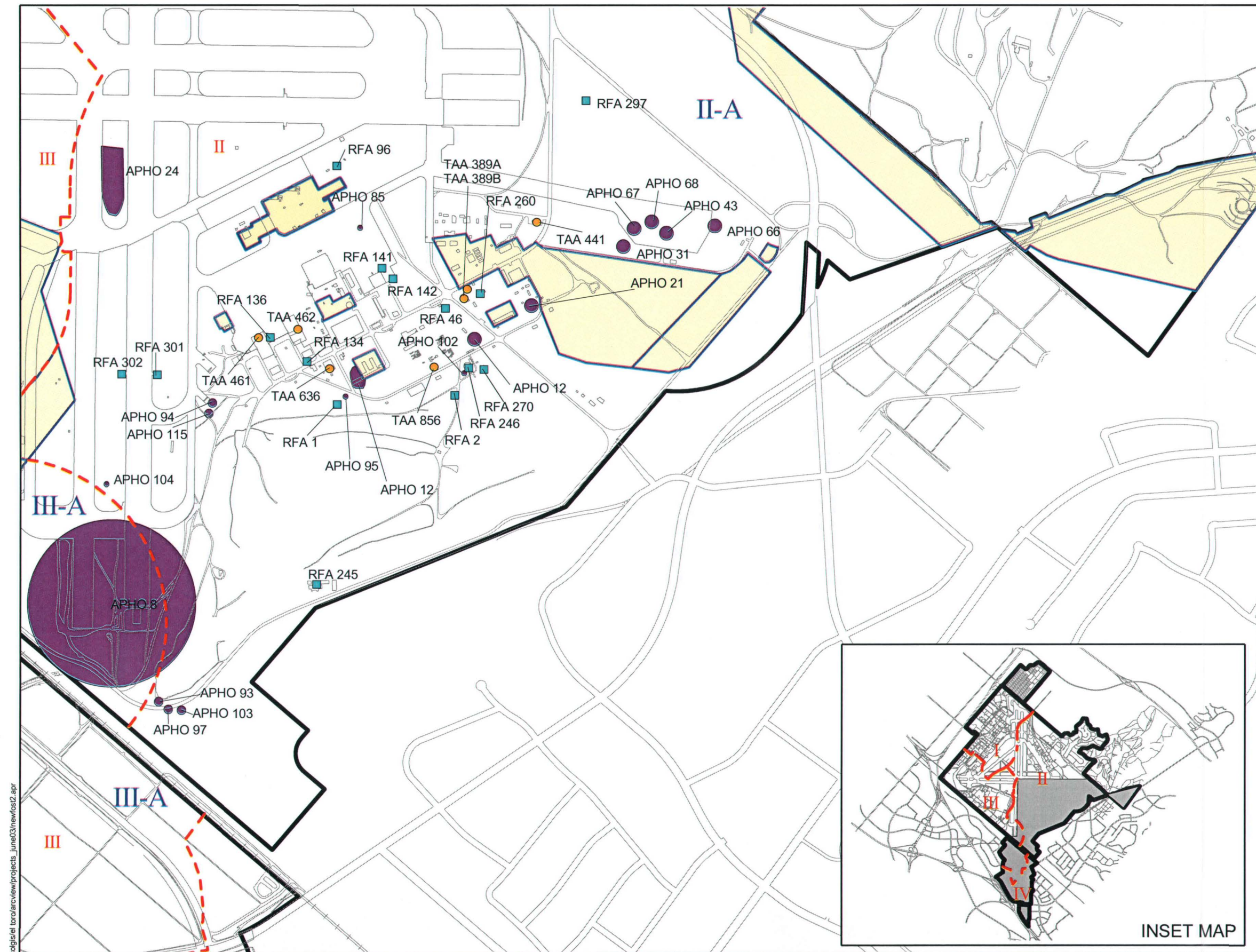
Final  
July 2004



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**Figure 3a**  
**Hazardous Substance LOCs**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**





### LEGEND

- Property Boundary
- Roads
- Buildings
- Navy Sale Parcel Boundary
- Navy Sale Parcel Number
- Transferable Area
- Carve-Out (Non-Transferable Area)
- II-A Transfer Parcel Number
- Aerial Photograph Anomaly Areas (APHO Sites)
- Temporary Accumulation Area (TAA) Site
- RCRA Facility Assessment (RFA) Site

### NOTES

RFA 12 has been identified as the basewide sanitary sewer system and is therefore not shown. RFA 247 has been identified as the pipeline which transferred water from the former sewage treatment plant (SW) to the golf course irrigation storage tank (SE) and is therefore not shown.

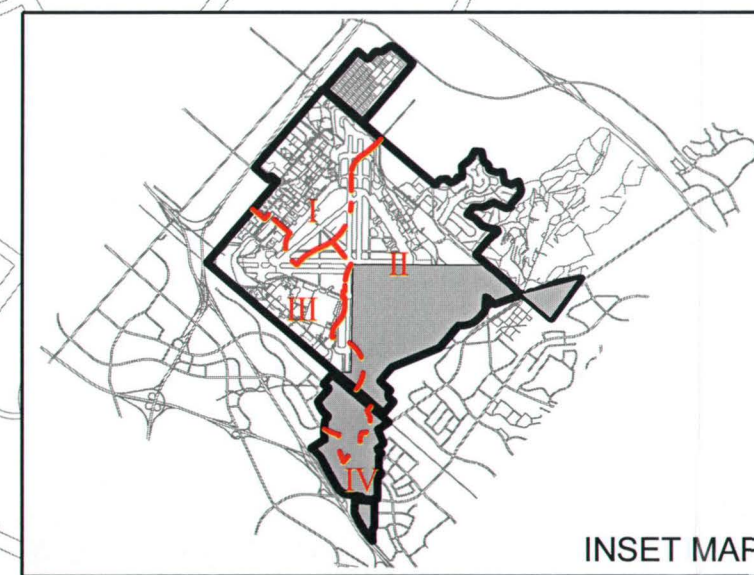
### SOURCE

Final Environmental Baseline Survey, Former Marine Corps Air Station El Toro, California. Earth Tech 2003.

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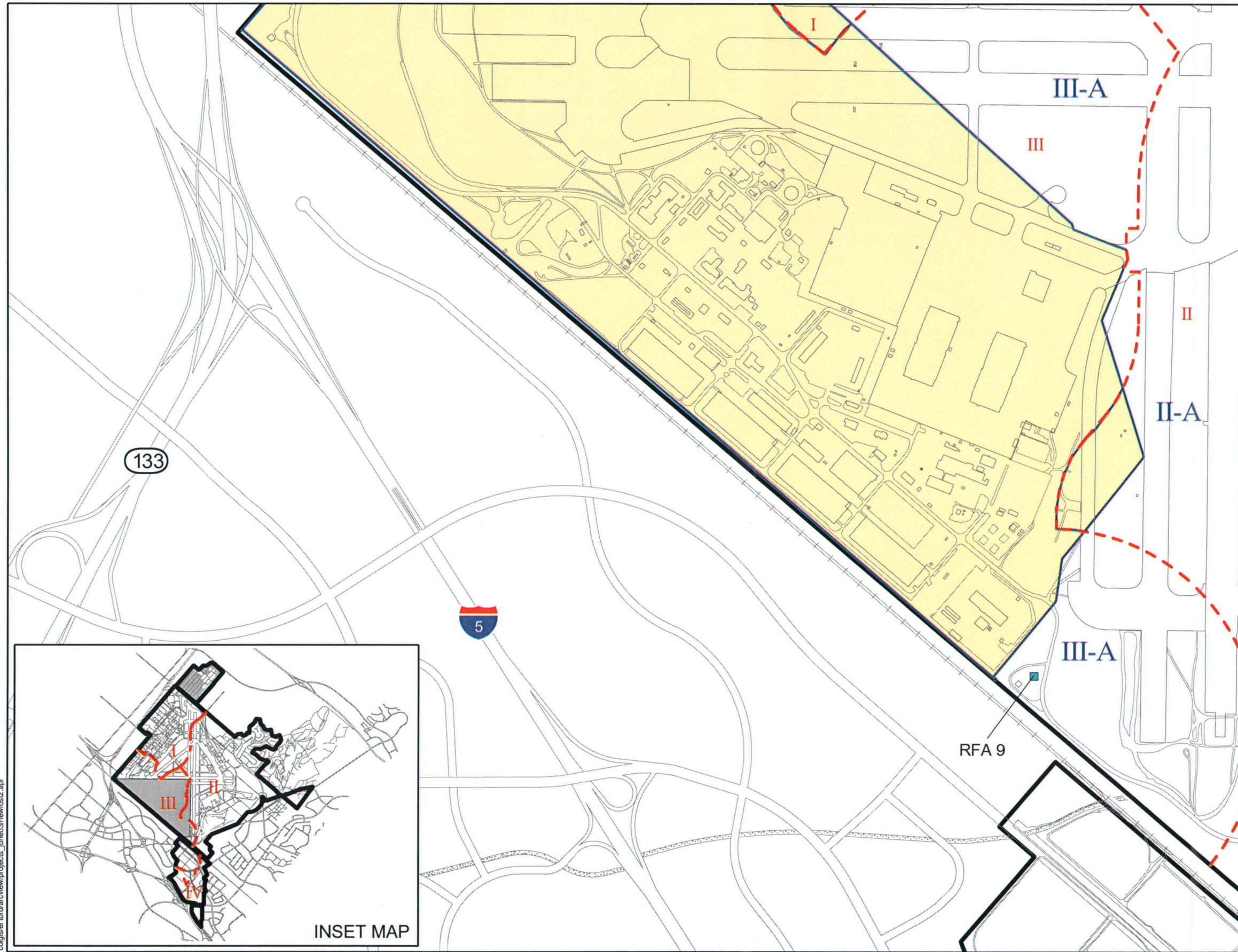
N

1000 0 1000 Feet



**Figure 3b**  
**Hazardous Substance LOCs**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**





## LEGEND

- Property Boundary
- Roads
- Buildings
- Navy Sale Parcel Boundary
- Navy Sale Parcel Number
- Transferable Area
- Carve-Out (Non-Transferable Area)
- Transfer Parcel Number
- RCRA Facility Assessment (RFA) Site

## NOTES

RFA 12 has been identified as the basewide sanitary sewer system and is therefore not shown. RFA 247 has been identified as the pipeline which transferred water from the former sewage treatment plant (SW) to the golf course irrigation storage tank (SE) and is therefore not shown.

## SOURCE

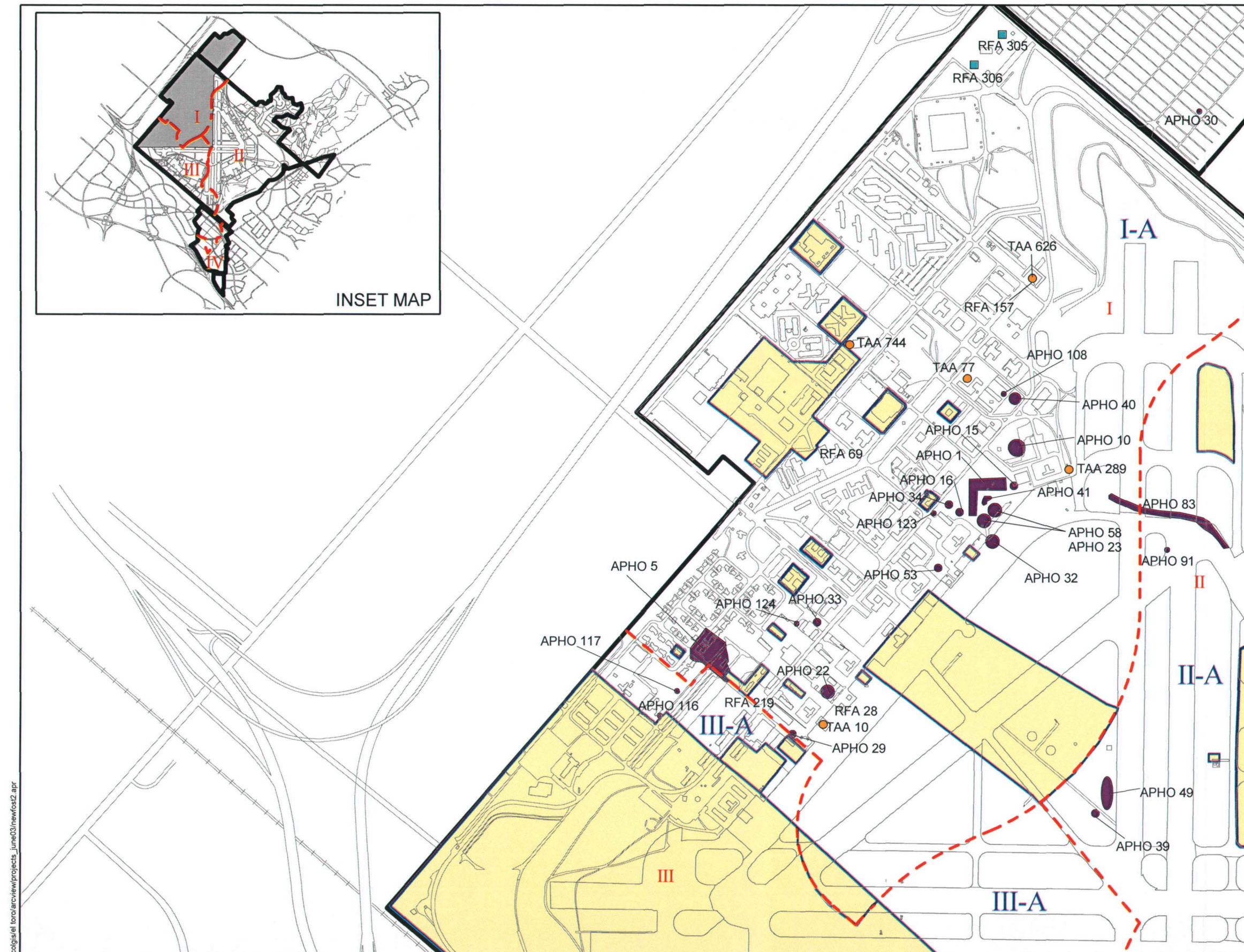
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Former Marine Corps Air Station  
El Toro, California. Earth Tech 2003.

Final  
July 2004

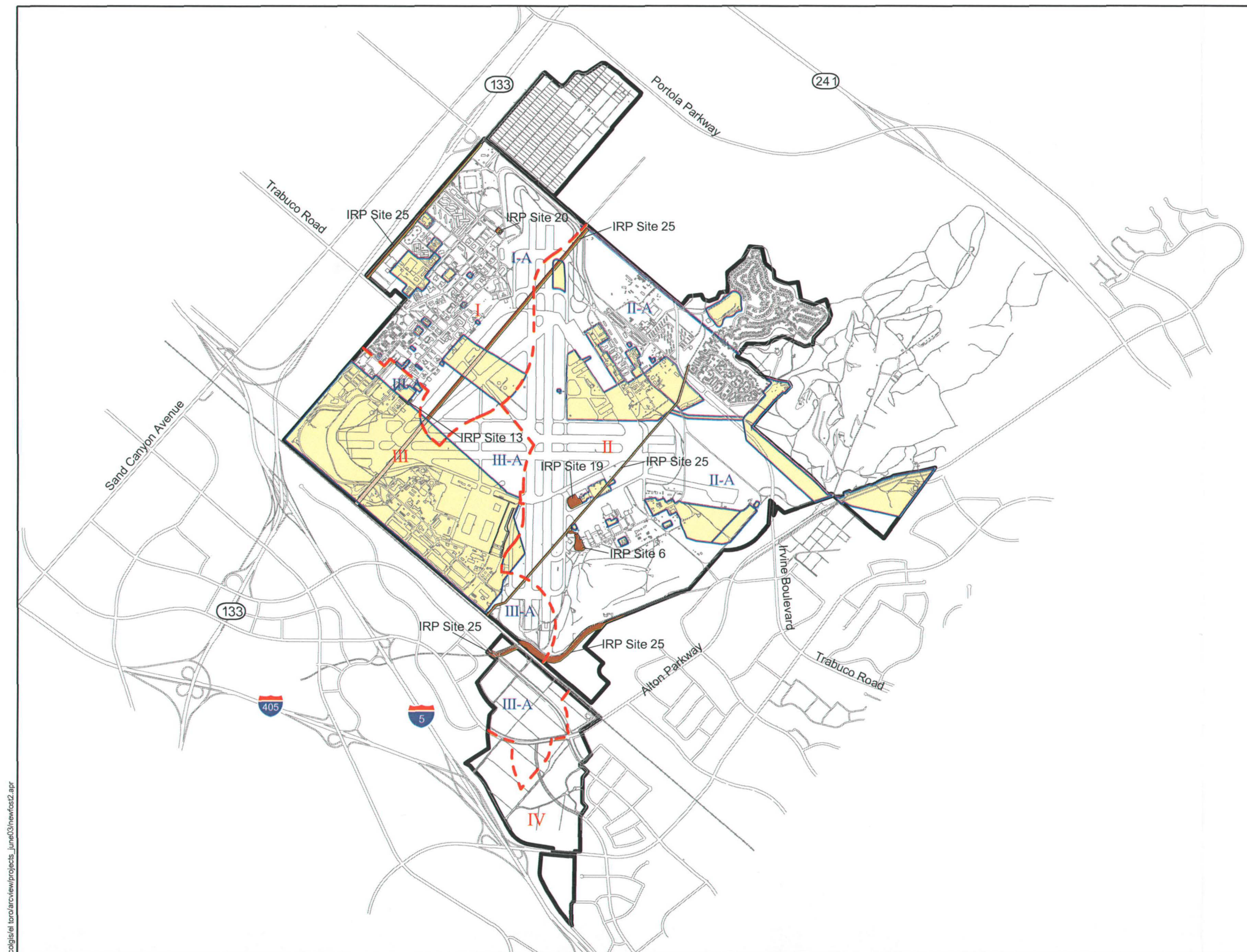


**Figure 3c**  
**Hazardous Substance LOCs**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**









### LEGEND

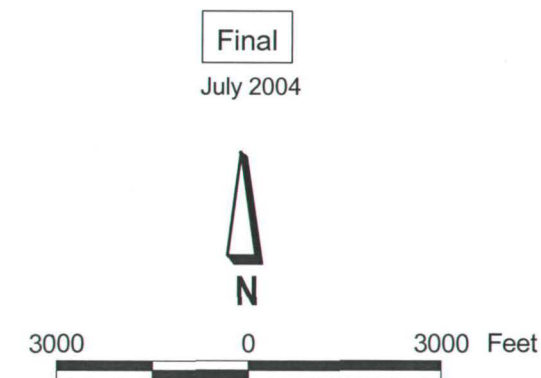
- Property Boundary
- Roads
- Buildings
- Groundwater Plume Boundary
- Navy Sale Parcel Boundary
- Navy Sale Parcel Number
- Transferable Area
- Carve-Out (Non-Transferable Area)
- Transfer Parcel Number
- IRP Sites (No Further Action)

### NOTES

- Only IRP Sites within transferable areas are shown.
- Refer to Attachment 6 figure for the location of all IRP sites and groundwater plumes with associated buffers.

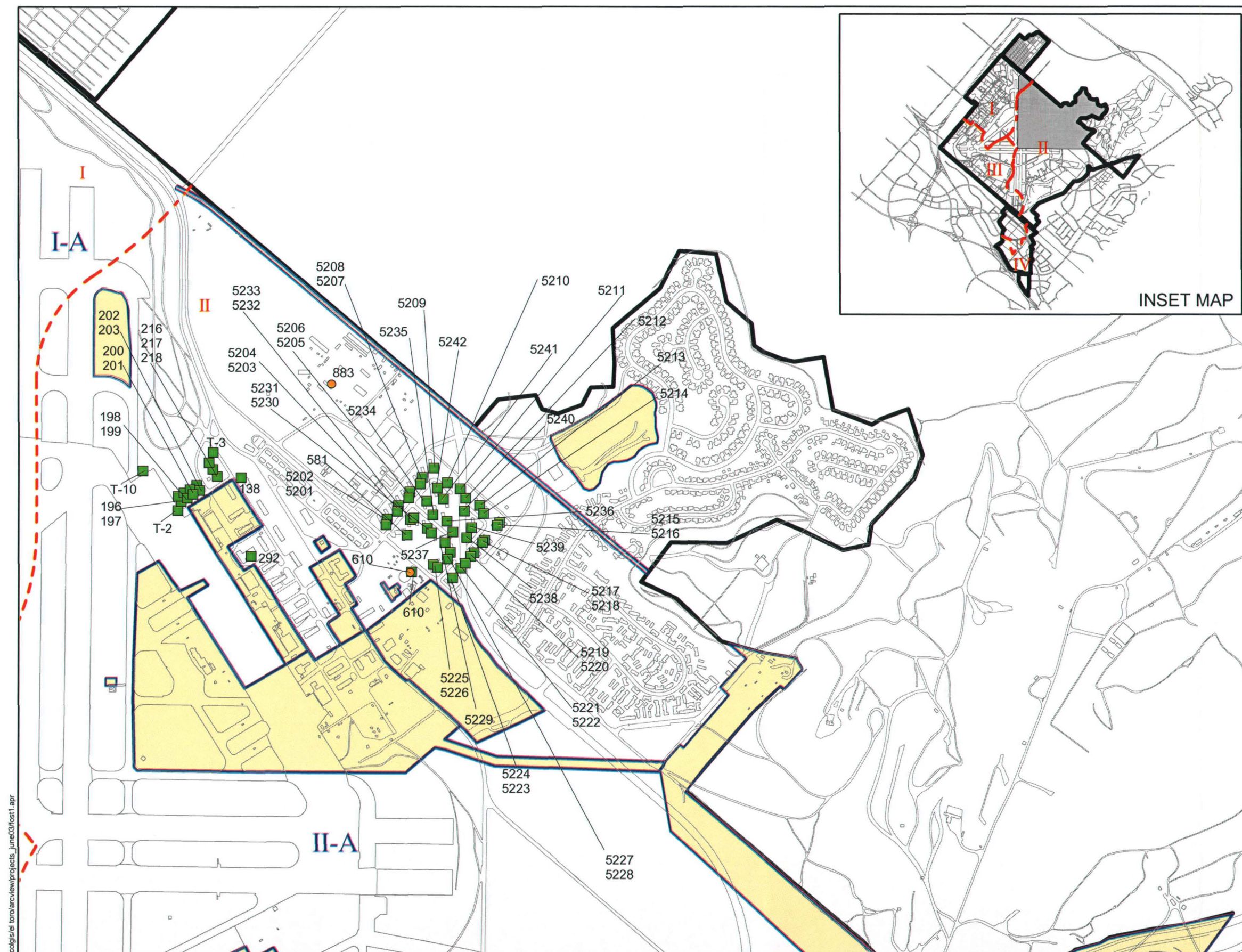
### SOURCE

Final Environmental Baseline Survey, Former Marine Corps Air Station, El Toro, California. Earth Tech 2003.



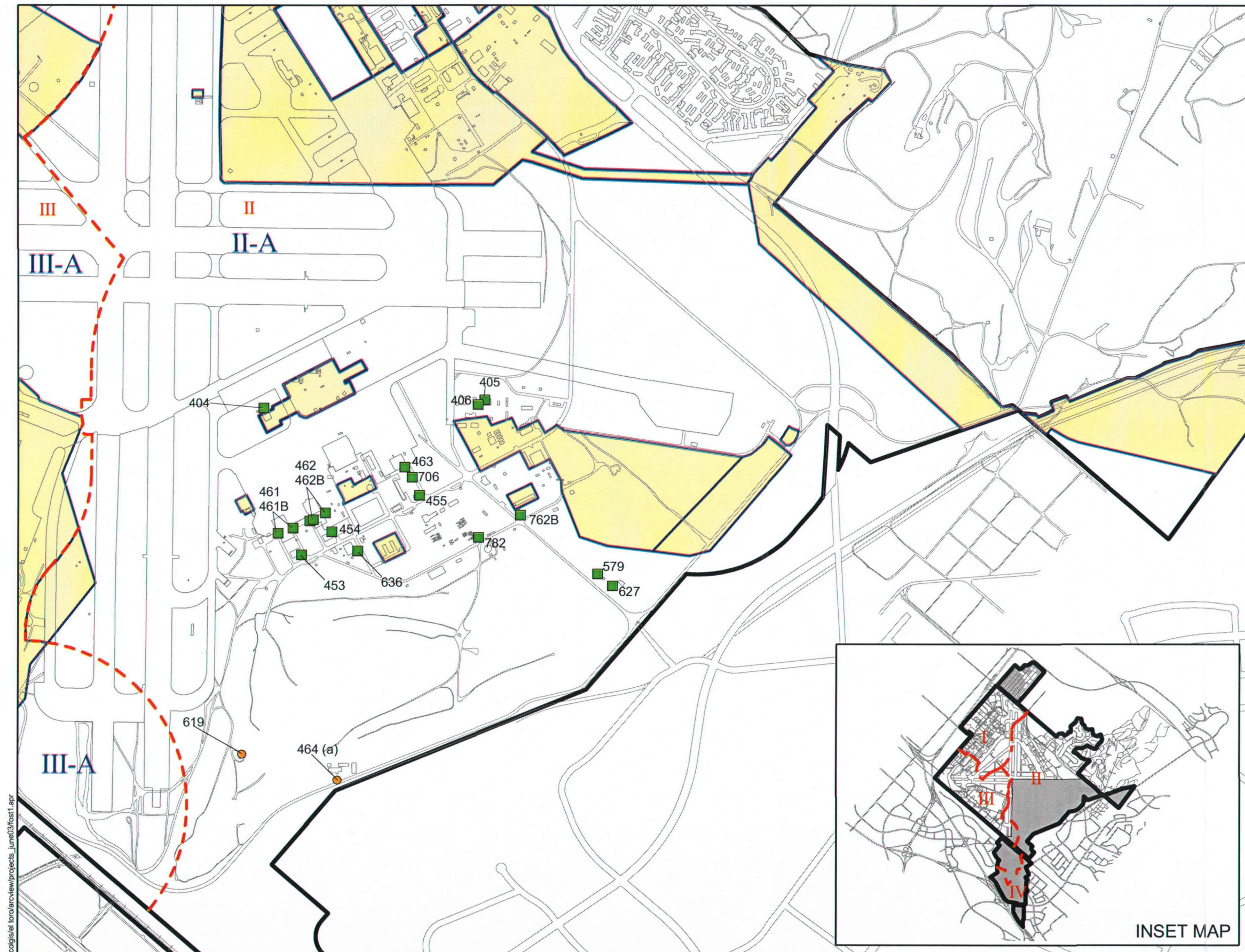
**Figure 4**  
**Installation Restoration Program Sites**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**





**Figure 5a**  
**AST and UST LOCs**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**





### LEGEND

- Property Boundary
- Roads
- Buildings
- Navy Sale Parcel Boundary
- Navy Sale Parcel Number
- Transferable Area
- Carve-Out (Non-Transferable Area)
- II-A Transfer Parcel Number
- Aboveground Storage Tank
- Underground Storage Tank

### NOTES

- ASTs 900 - 902, and 909 (diesel); 903-907 (gasoline); and, 908 (empty); ASTs AG-1 (powdered chalk); AG-2, AG-6, AG-7, AG-8, AG-9, and AG-11 (liquid fertilizer); AG-3, AG-4, and AG-5 (empty); and AG-10 (diesel) are within the agricultural lease areas. These tanks are the responsibility of the lessee and are therefore not shown.
- AST 619 (diesel) is situated at a facility that is being leased. This tank is the responsibility of the lessee.
- The above listed ASTs were evaluated as part of the VSIs (including background review) and no known impacts were identified; therefore, the associated property is suitable for transfer.
- All underground storage tanks have been removed except for those noted as active (a).

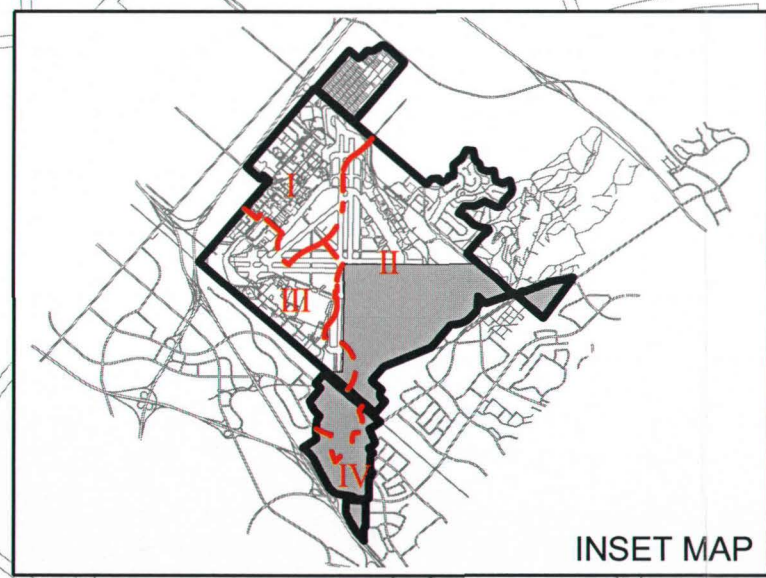
### SOURCE

Final Environmental Baseline Survey, Former Marine Corps Air Station El Toro, California. Earth Tech 2003.

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July 2004

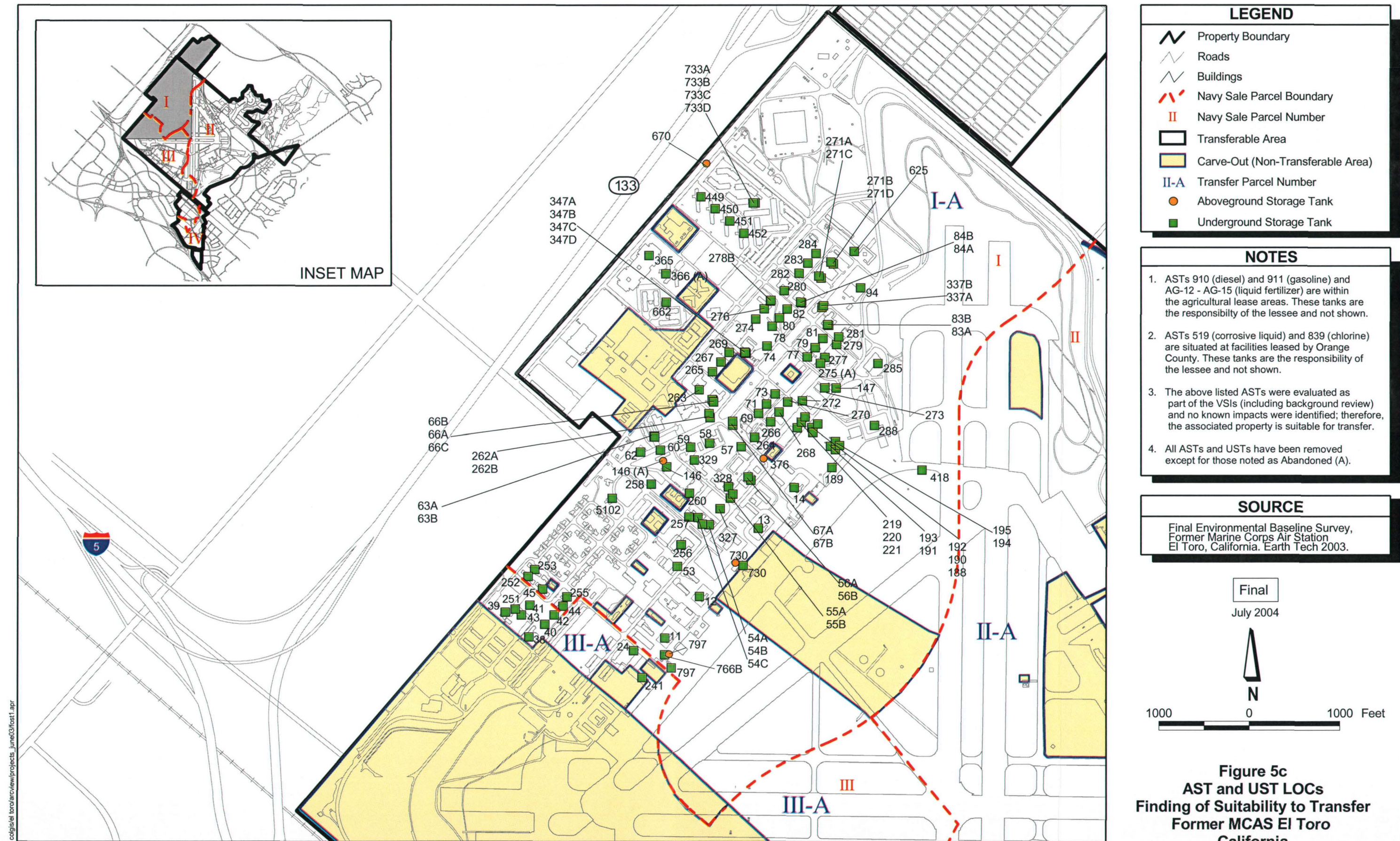
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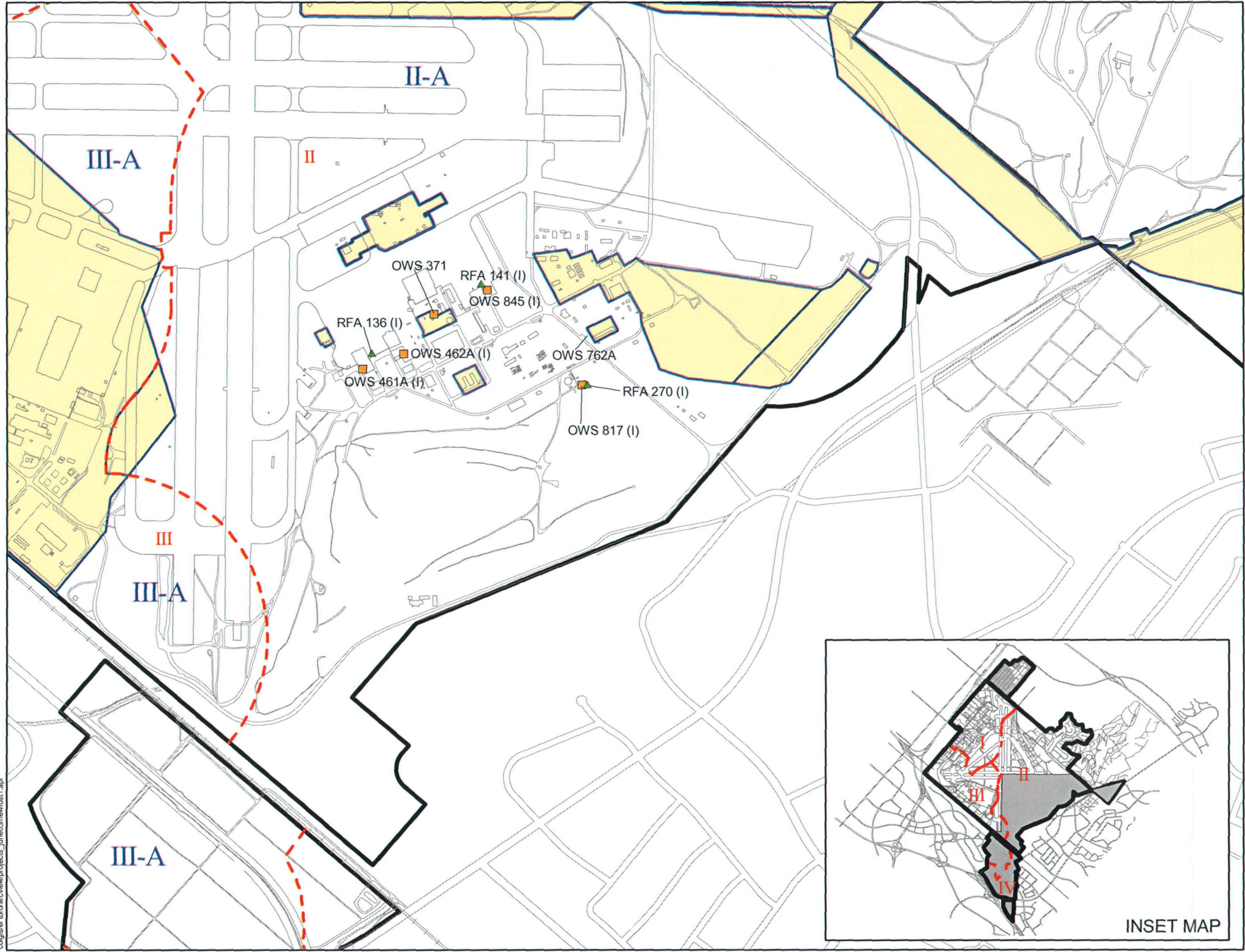


**Figure 5b**  
**AST and UST LOCs**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**









### LEGEND

- Property Boundary
- Roads
- Buildings
- Transferable Area
- Carve-Out (Non-Transferable Area)
- II-A Transfer Parcel Number
- Navy Sale Parcel Boundary
- Navy Sale Parcel Number
- Wash Rack
- Oil/Water Separator

### NOTES

All Wash Racks shown were identified as RFA LOCs.

All Oil/Water Separators and Wash Racks have been removed except for those noted as Inactive (I).

### SOURCE

Final Environmental Baseline Survey, Former Marine Corps Air Station El Toro, California. Earth Tech 2003.

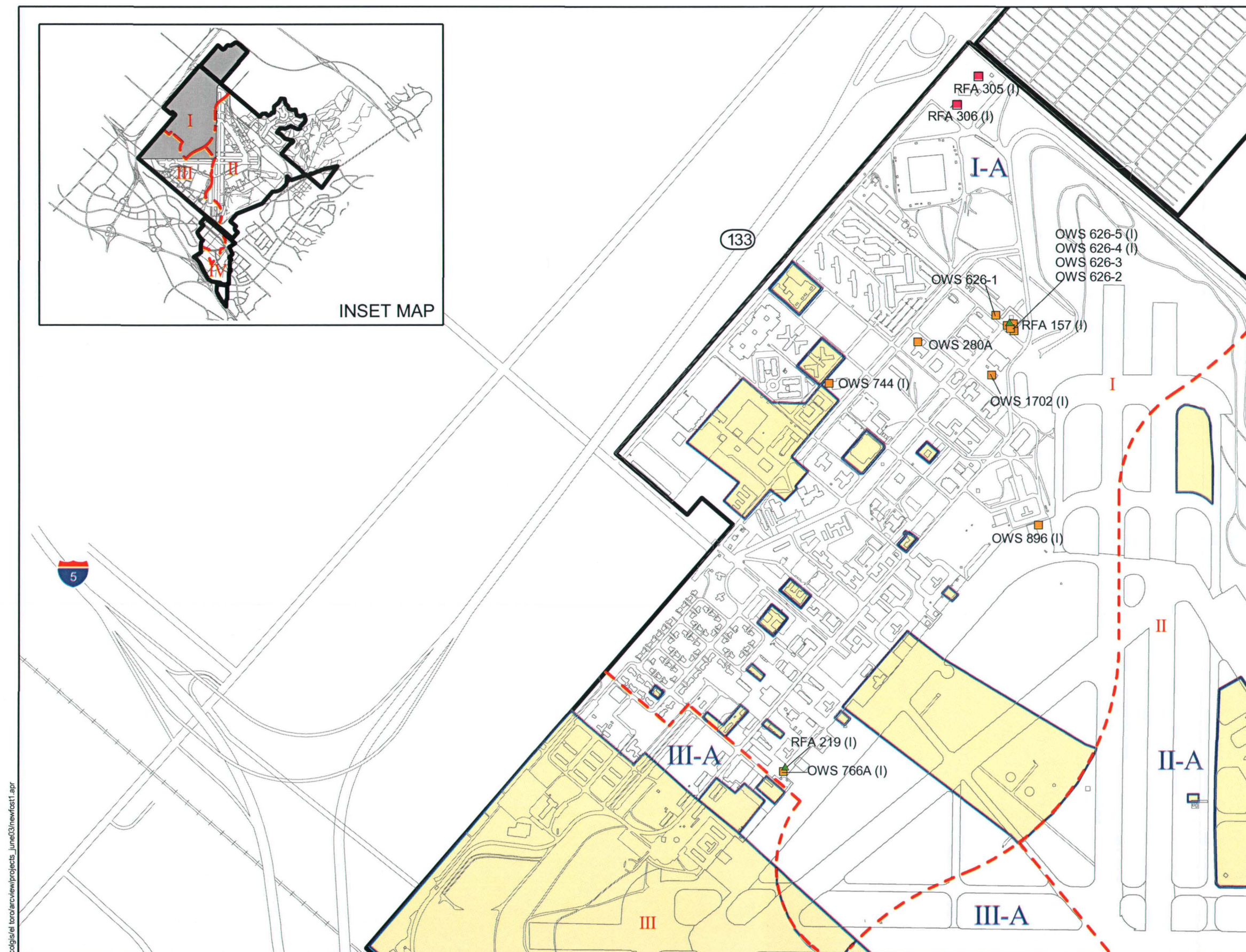
Final  
July 2004

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**Figure 6a**  
**Wastewater Treatment and**  
**Related System LOCs**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**

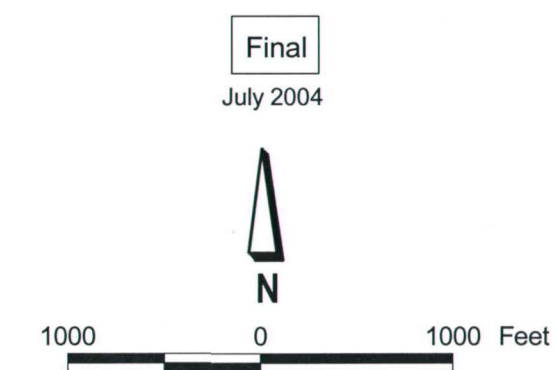




LEGEND	
	Property Boundary
	Roads
	Buildings
	Transferable Area
	Carve-Out (Non-Transferable Area)
	Transfer Parcel Number
	Navy Sale Parcel Boundary
	Navy Sale Parcel Number
	Wash Rack
	Oil/Water Separator
	Septic Tank

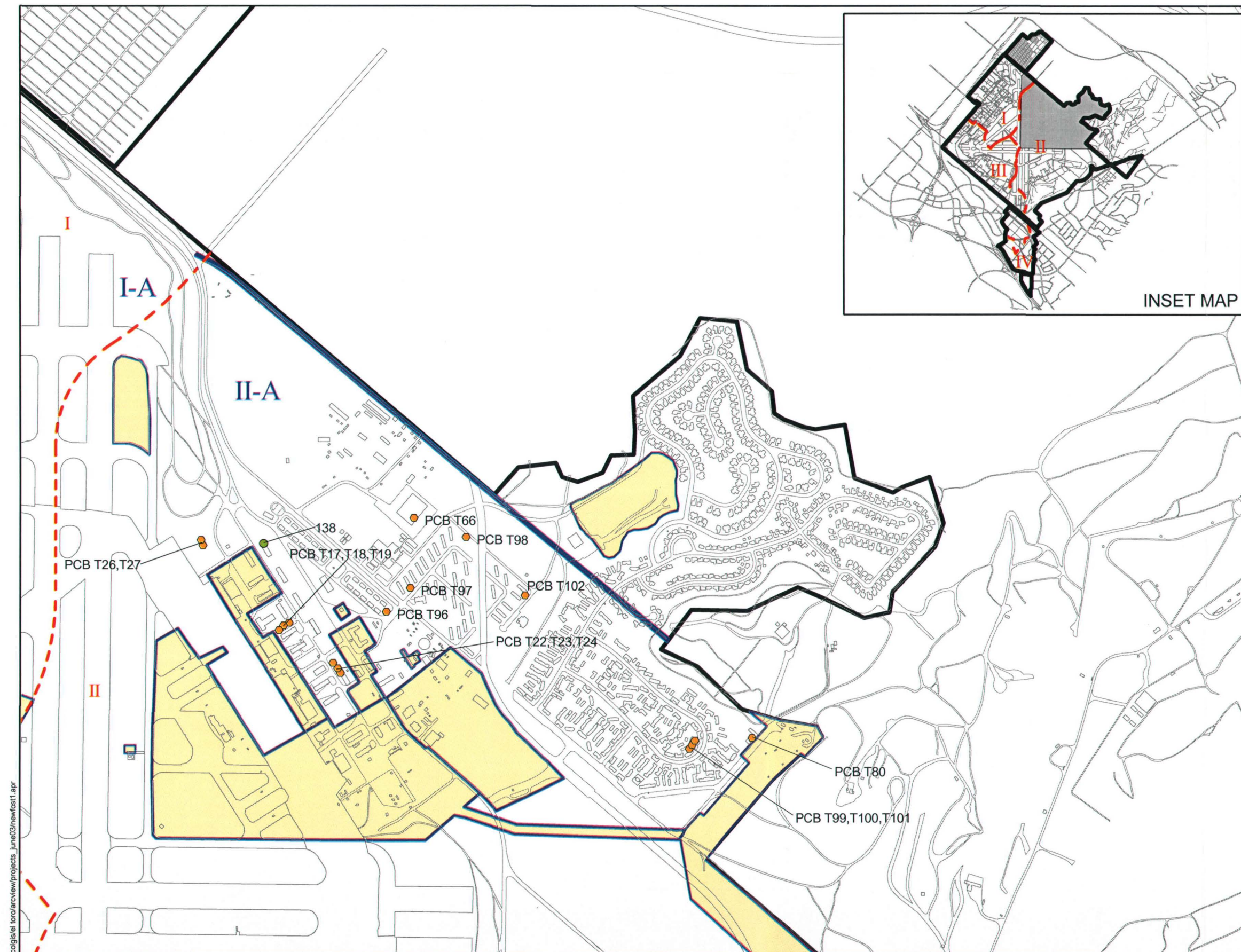
NOTES
All Wash Racks and Septic Tanks shown were identified as RFA LOCs.
Information regarding Septic Tanks (RFA 305 and RFA 306) is provided in Table 3.
All Oil/Water Separators, Wash Racks, and Septic Tanks have been removed except for those noted as Inactive (I).

SOURCE
Final Environmental Baseline Survey, Former Marine Corps Air Station El Toro, California. Earth Tech 2003.



**Figure 6b**  
**Wastewater Treatment and Related System LOCs**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**





LEGEND

Property Boundary

Roads

Buildings

Transferable Area

Carve-Out (Non-Transferable Area)

Transfer Parcel Number

Navy Sale Parcel Boundary

Navy Sale Parcel Number

Non-Transformer PCB Equipment

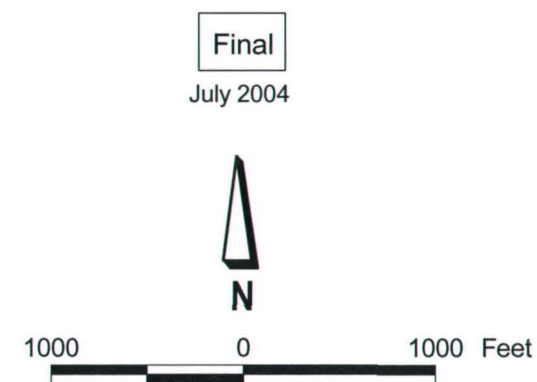
PCB Transformer

NOTES

All Non-Transformer PCB Equipment shown (without the PCB prefix) were previously identified during a survey and were not designated as LOCs.

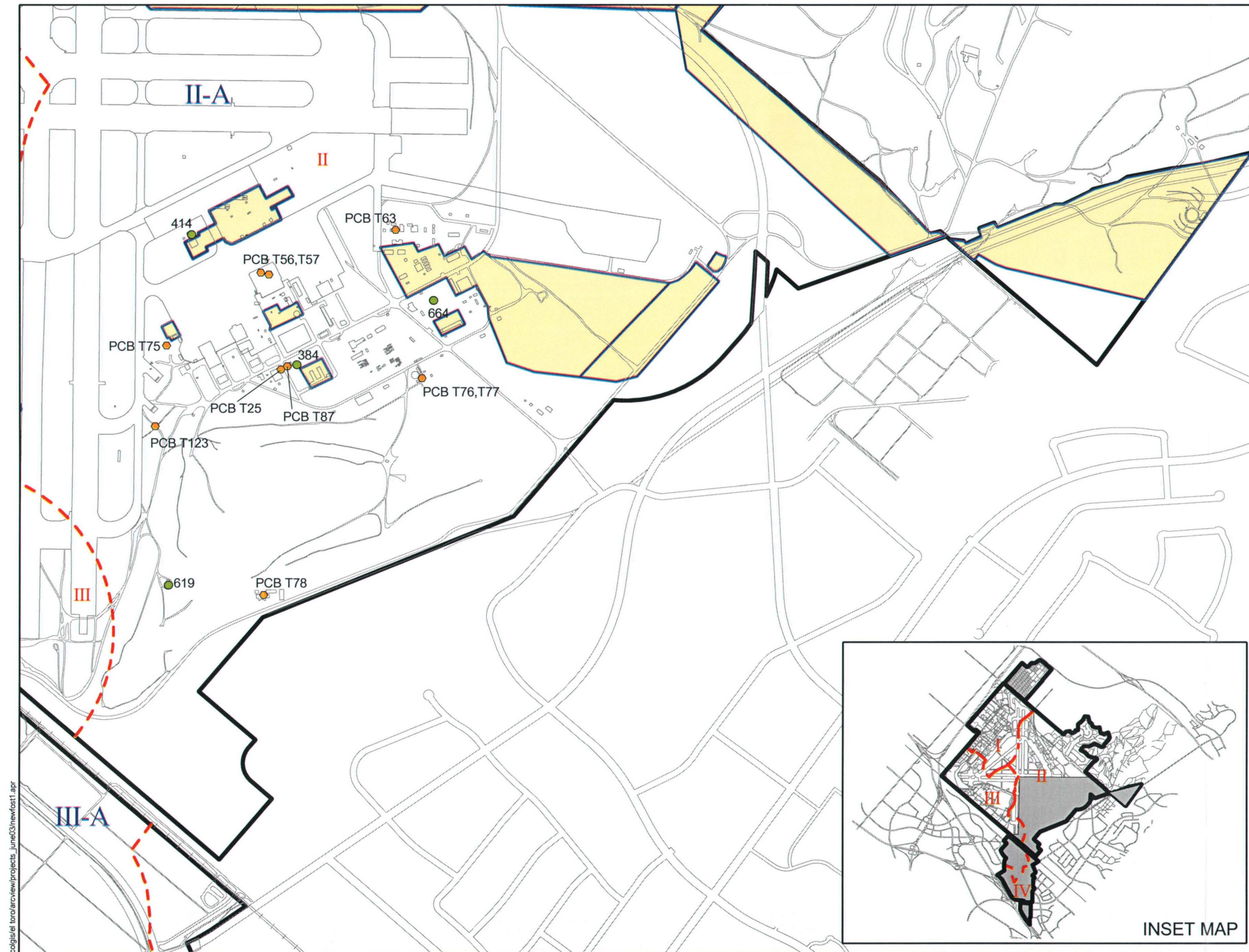
SOURCE

Final Environmental Baseline Survey, Former Marine Corps Air Station El Toro, California. Earth Tech 2003.



**Figure 7a**  
**PCB LOCs**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**





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## LEGEND

- Property Boundary
- Roads
- Buildings
- Transferable Area
- Carve-Out (Non-Transferable Area)
- II-A Transfer Parcel Number
- Navy Sale Parcel Boundary
- II Navy Sale Parcel Number
- Non-Transformer PCB Equipment
- PCB Transformer

## NOTES

All Non-Transformer PCB Equipment shown (without the PCB prefix) were previously identified during a survey and were not designated as LOCs.

## SOURCE

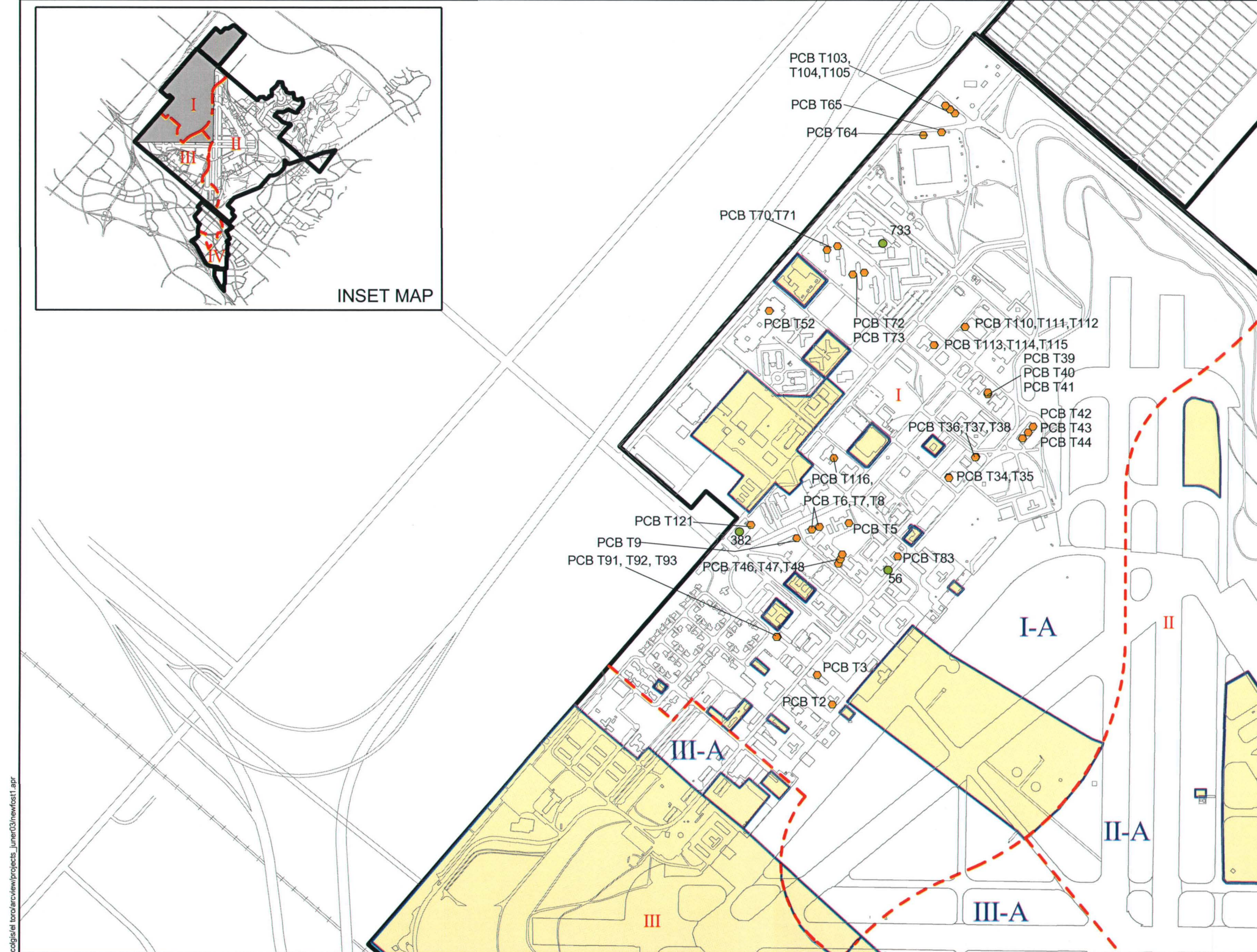
Final Environmental Baseline Survey, Former Marine Corps Air Station El Toro, California. Earth Tech 2003.

Final  
July 2004



**Figure 7b**  
**PCB LOCs**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**





### LEGEND

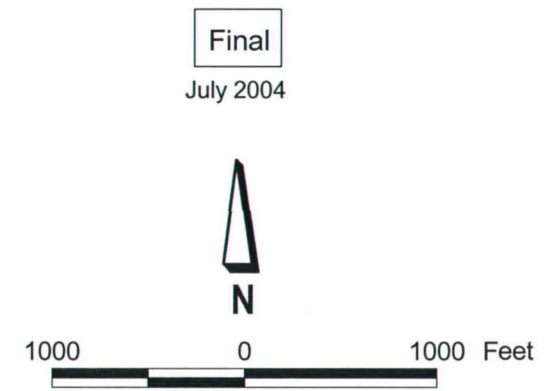
- Property Boundary
- Roads
- Buildings
- Transferable Area
- Carve-Out (Non-Transferable Area)
- Transfer Parcel Number
- Navy Sale Parcel Boundary
- Navy Sale Parcel Number
- Non-Transformer PCB Equipment
- PCB Transformer

### NOTES

All Non-Transformer PCB Equipment shown (without the PCB prefix) were previously identified during a survey and were not designated as LOCs.

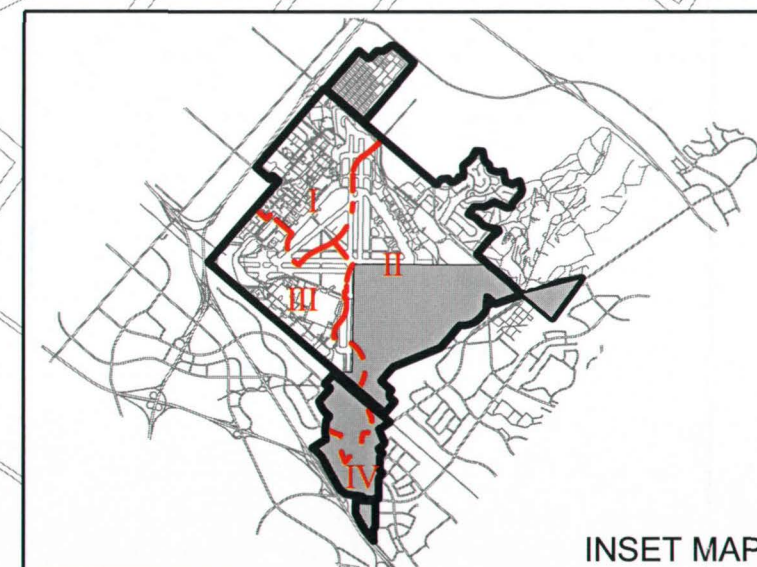
### SOURCE

Final Environmental Baseline Survey, Former Marine Corps Air Station El Toro, California. Earth Tech 2003.



**Figure 7c**  
**PCB LOCs**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**





## LEGEND

- Property Boundary
- Roads
- Buildings
- Transferable Area
- Carve-Out (Non-Transferable Area)
- Transfer Parcel Number
- Navy Sale Parcel Boundary
- Navy Sale Parcel Number
- Miscellaneous LOCs

## NOTES

The 1995 EBS designated those sites that do not fall under a general LOC type as Miscellaneous (MSC) LOCs (such as pesticide storage areas, fire training burn pits, drum storage areas, etc.).

All MSC LOCs located on transferable property are inactive.

## SOURCE

Final Environmental Baseline Survey,  
Former Marine Corps Air Station  
El Toro, California. Earth Tech 2003.

Final

July 2004

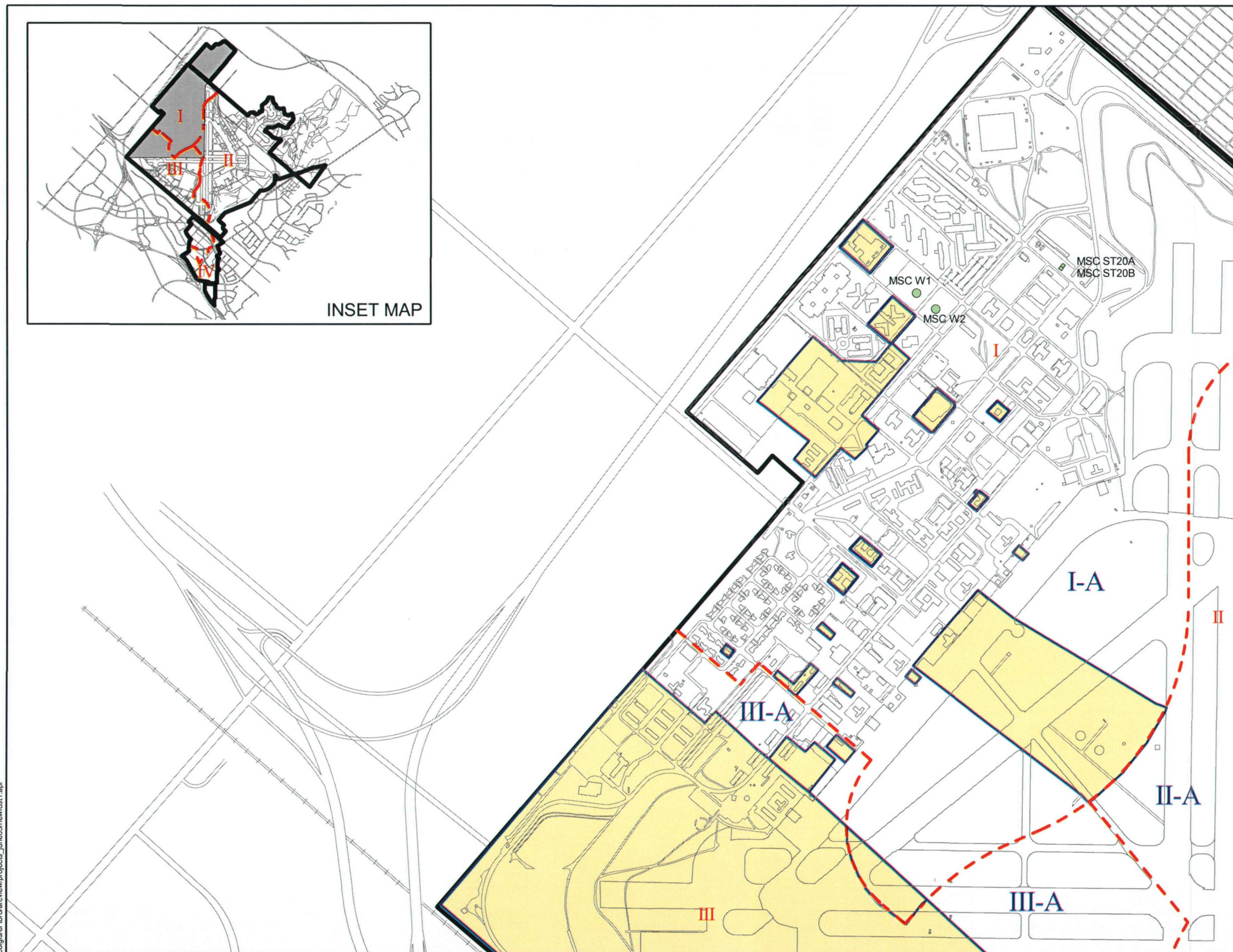
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1000 0 1000 Feet

**Figure 8a**  
**Miscellaneous LOCs**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**



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## LEGEND

- Property Boundary
- Roads
- Buildings
- Transferable Area
- Carve-Out (Non-Transferable Area)
- II-A Transfer Parcel Number
- Navy Sale Parcel Boundary
- II Navy Sale Parcel Number
- Miscellaneous LOCs

## NOTES

The 1995 EBS designated those sites that do not fall under a general LOC type as Miscellaneous (MSC) LOCs (such as pesticide storage areas, fire training burn pits, drum storage areas, etc.).

All MSC LOCs located on transferable property are inactive except for MSC W1 and MSC W2 which are removed.

## SOURCE

Final Environmental Baseline Survey, Former Marine Corps Air Station, El Toro, California. Earth Tech 2003.

Final  
July 2004



1000 0 1000 Feet

**Figure 8b**  
**Miscellaneous LOCs**  
**Finding of Suitability to Transfer**  
**Former MCAS El Toro**  
**California**

**Attachment 1**  
**No Further Action Regulatory Agency Concurrence Letters**

ATTACHMENT 1 – NO FURTHER ACTION  
REGULATORY AGENCY CONCURRENCE LETTER  
IS CONTAINED IN ELECTRONIC FORMAT.

TO VIEW THE DATA, CONTACT:

**DIANE C. SILVA**  
**RECORDS MANAGEMENT SPECIALIST**  
**SOUTHWEST DIVISION**  
**NAVAL FACILITIES ENGINEERING COMMAND**  
**1220 PACIFIC HIGHWAY**  
**SAN DIEGO, CA 92132**

**TELEPHONE: (619) 532-3676**



**Attachment 2**  
**Hazardous Substances and Petroleum Products**  
**Notification Table**

**Attachment 2a: Petroleum Products Notification Table**

<b>Transfer Parcel ID</b>	<b>LOC ID</b>	<b>Petroleum Products*</b>	<b>Dates of Operation</b>	<b>Activities Conducted At Site</b>
<b>Transfer Parcel I-A</b>				
I-A	RFA 157	Solvents, Waste Oils	Unknown-1999	D
I-A	APHO 23	Unknown	Unknown-1999	ND
I-A	AST 146	Diesel	Unknown-1999	S
I-A	AST 376	Diesel	Unknown-1999	S
I-A	AST 670	Propane	Unknown-1999	S
I-A	AST 730	Diesel	Unknown-1999	S
I-A	AST 797	Waste Oil	Unknown-1999	S
I-A	UST 11	Diesel	1943-1992	S
I-A	UST 12	Diesel	Unknown-1992	S
I-A	UST 13	Diesel	1943-1992	S
I-A	UST 14	Diesel	1943-1997	S
I-A	UST 44	Diesel	1943-1999	S
I-A	UST 45	Fuel Oil	1943-1999	S
I-A	UST 53	Diesel	1943-1992	S
I-A	UST 54A	Diesel	1943-1992	S
I-A	UST 54B	Diesel	1943-1996	S
I-A	UST 54C	Diesel	1943-1999	S
I-A	UST 55A	Fuel	1943-1998	S
I-A	UST 55B	Fuel	1943-1998	S
I-A	UST 56A	Diesel	1943-1997	S
I-A	UST 56B	Fuel Oil	1943-1999	S
I-A	UST 57	Fuel Oil	1943-1994	S
I-A	UST 58	Diesel	1943-1994	S
I-A	UST 59	Diesel	1943-1994	S
I-A	UST 60	Diesel	1943-1997	S
I-A	UST 62	Fuel Oil	1943-1998	S
I-A	UST 63A	Diesel	1943-1996	S
I-A	UST 63B	Diesel	1943-1996	S
I-A	UST 66A	Diesel	1943-1994	S
I-A	UST 66B	Diesel	1943-1994	S
I-A	UST 66C	Diesel/Oil	1943-1997	S
I-A	UST 67A	Fuel Oil	1943-1999	S
I-A	UST 67B	Fuel Oil	1943-1999	S
I-A	UST 69	Fuel Oil	1943-1992	S
I-A	UST 71	Fuel Oil	1943-1992	S
I-A	UST 73	Diesel	1943-1996	S
I-A	UST 74	Diesel	1943-1996	S
I-A	UST 77	Diesel	1943-1992	S
I-A	UST 78	Diesel	1943-1996	S
I-A	UST 79	Fuel Oil	1943-1999	S
I-A	UST 80	Diesel	1943-1992	S
I-A	UST 81	Diesel	1943-1996	S
I-A	UST 82	Diesel	1943-1996	S
I-A	UST 83A	Fuel Oil	1943-1994	S

**Attachment 2a: Petroleum Products Notification Table**

<b>Transfer Parcel ID</b>	<b>LOC ID</b>	<b>Petroleum Products*</b>	<b>Dates of Operation</b>	<b>Activities Conducted At Site</b>
I-A	UST 83B	Fuel Oil	1943-1994	S
I-A	UST 84A	Diesel	1943-1999	S
I-A	UST 84B	Fuel Oil	1943-1999	S
I-A	UST 94	Fuel Oil	1943-1994	S
I-A	UST 146	Fuel oil	1945-1996	S
I-A	UST 147	Diesel	1943-1999	S
I-A	UST 188	Unknown	1945-1996	S
I-A	UST 189	Waste Oil	1945-1996	S
I-A	UST 190	Unknown	1945-1996	S
I-A	UST 191	Waste Oil	1945-1996	S
I-A	UST 192	Unknown	1945-1996	S
I-A	UST 193	Unknown	1945-1996	S
I-A	UST 194	Unknown	1945-1996	S
I-A	UST 195	Waste Fuel	1945-1996	S
I-A	UST 219	Unknown	1945-1996	S
I-A	UST 220	Unknown	1945-1996	S
I-A	UST 221	Unknown	1945-1996	S
I-A	UST 252	Diesel	1945-1996	S
I-A	UST 253	Fuel Oil	1945-1999	S
I-A	UST 255	Fuel Oil	1945-1999	S
I-A	UST 256	Fuel Oil	1945-1998	S
I-A	UST 257	Fuel Oil	1944-1997	S
I-A	UST 258	Fuel Oil	1944-1997	S
I-A	UST 260	Fuel Oil	1945-1994	S
I-A	UST 262A	Diesel	1944-1990	S
I-A	UST 262B	Diesel	1944-1990	S
I-A	UST 263	Diesel	1945-1993	S
I-A	UST 264	Diesel	1945-1993	S
I-A	UST 265	Diesel	Unknown-1996	S
I-A	UST 266	Fuel Oil	1945-1996	S
I-A	UST 267	Fuel Oil	1945-1996	S
I-A	UST 268	Fuel Oil	1945-1997	S
I-A	UST 269	Fuel Oil	1945-1996	S
I-A	UST 270	Fuel Oil	1945-1997	S
I-A	UST 271A	Fuel Oil	1944-1994	S
I-A	UST 271B	Fuel Oil	1944-1994	S
I-A	UST 271C	Fuel Oil	1944-1994	S
I-A	UST 271D	Fuel Oil	1944-1994	S
I-A	UST 272	Fuel Oil	1944-1994	S
I-A	UST 273	Fuel Oil	1944-1994	S
I-A	UST 274	Fuel Oil	1945-1997	S
I-A	UST 275	Fuel Oil	1944-1999	S
I-A	UST 276	Fuel Oil	1945-1994	S
I-A	UST 277	Fuel Oil	1945-1994	S
I-A	UST 278B	Fuel Oil	1945-1997	S

**Attachment 2a: Petroleum Products Notification Table**

<b>Transfer Parcel ID</b>	<b>LOC ID</b>	<b>Petroleum Products*</b>	<b>Dates of Operation</b>	<b>Activities Conducted At Site</b>
I-A	UST 279	Fuel Oil	1945-1997	S
I-A	UST 280	Diesel	1945-1996	S
I-A	UST 281	Fuel Oil	1945-1997	S
I-A	UST 282	Fuel Oil	1945-1997	S
I-A	UST 283	Fuel Oil	1945-1997	S
I-A	UST 284	Fuel Oil	1945-1997	S
I-A	UST 285	Fuel Oil	1944-1996	S
I-A	UST 288	Fuel Oil	1944-1994	S
I-A	UST 327	Diesel	1945-1996	S
I-A	UST 328	Diesel	1945-1991	S
I-A	UST 329	Diesel	1945-1993	S
I-A	UST 337A	Fuel Oil	1946-1997	S
I-A	UST 337B	Fuel Oil	1946-1997	S
I-A	UST 347A	Gasoline	1948-1993	S
I-A	UST 347B	Gasoline	1948-1993	S
I-A	UST 347C	Gasoline	1948-1993	S
I-A	UST 347D	Waste Oil	1948-1993	S
I-A	UST 365	Diesel	1954-1999	S
I-A	UST 366	Diesel	1954-1994	S
I-A	UST 418	Fuel Oil	1956-1997	S
I-A	UST 449	Fuel Oil	1959-1994	S
I-A	UST 450	Diesel	1959-1993	S
I-A	UST 451	Diesel	1959-1994	S
I-A	UST 452	Diesel	1959-1993	S
I-A	UST 625	Waste Oil	1967-1996	S
I-A	UST 662	Fuel Oil	1960-1993	S
I-A	UST 730	Diesel	1978-1999	S
I-A	UST 733A	Diesel	1980-1993	S
I-A	UST 733B	Diesel	1980-1993	S
I-A	UST 733C	Diesel	1980-1993	S
I-A	UST 733D	Diesel	1980-1997	S
I-A	UST 766B	Waste Oil	1982-1999	S
I-A	UST 797	Aviation Gasoline	1985-1999	S
I-A	UST 5102	Fuel Oil	1943-1999	S
I-A	OWS 1702	Oily Water	Unknown-1999	S
I-A	MSC ST20A	Multiple Petroleum Products (Petroleum Storage)	Unknown-1999	S
I-A	MSC ST20B	Multiple Petroleum Products (Petroleum Storage)	Unknown-1999	S
I-A	IRP 20	Kerosene	Unknown-1999	ND



**Attachment 2a: Petroleum Products Notification Table**

Transfer Parcel ID	LOC ID	Petroleum Products*	Dates of Operation	Activities Conducted At Site
<b>Transfer Parcel II-A</b>				
II-A	RFA 260	Unknown	Unknown-1999	S
II-A	RFA 270	Solvent, Waste Oils	Unknown-1999	D
II-A	AST 464	Propane	Unknown-1999	S
II-A	AST 610	Diesel	Unknown-1999	S
II-A	AST 619	Diesel	Unknown-1999	S
II-A	AST 883	Waste oil	Unknown-1999	S
II-A	UST 138	Diesel	1943-1997	S
II-A	UST 196	Diesel	1943-1996	S
II-A	UST 197	Diesel	1943-1996	S
II-A	UST 198	JP-5	1943-1996	S
II-A	UST 199	JP-5	1943-1996	S
II-A	UST 200	JP-5	1943-1996	S
II-A	UST 201	JP-4	1943-1996	S
II-A	UST 202	JP-4	1943-1996	S
II-A	UST 203	JP-4	1943-1996	S
II-A	UST 216	Diesel	1943-1996	S
II-A	UST 217	Diesel	1943-1996	S
II-A	UST 218	Diesel	1943-1996	S
II-A	UST 292	Diesel	1944-1996	S
II-A	UST 404	Diesel	1957-1999	S
II-A	UST 405	Diesel	1956-1993	S
II-A	UST 406	Diesel	1956-1993	S
II-A	UST 453	Diesel	1960-1997	S
II-A	UST 454	Diesel	1960-1997	S
II-A	UST 455	Diesel	1960-1991	S
II-A	UST 461	Diesel	1960-1993	S
II-A	UST 461B	Waste Oil	Unknown-1999	S
II-A	UST 462	Diesel	1960-1993	S
II-A	UST 462B	Waste Oil	Unknown-1999	S
II-A	UST 463	Diesel	Unknown-1993	S
II-A	UST 5201	Fuel Oil	1945-1995	S
II-A	UST 5202	Diesel	1945-1995	S
II-A	UST 5203	Diesel	1945-1995	S
II-A	UST 5204	Diesel	1945-1995	S
II-A	UST 5205	Diesel	1945-1995	S
II-A	UST 5206	Diesel	1945-1995	S
II-A	UST 5207	Diesel	1945-1995	S
II-A	UST 5208	Diesel	1945-1995	S
II-A	UST 5209	Diesel	1945-1995	S
II-A	UST 5210	Diesel	1945-1990	S
II-A	UST 5211	Diesel	1945-1990	S
II-A	UST 5212	Diesel	1945-1996	S
II-A	UST 5213	Diesel	1945-1995	S
II-A	UST 5214	Diesel	1945-1995	S

**Attachment 2a: Petroleum Products Notification Table**

<b>Transfer Parcel ID</b>	<b>LOC ID</b>	<b>Petroleum Products*</b>	<b>Dates of Operation</b>	<b>Activities Conducted At Site</b>
II-A	UST 5215	Diesel	1945-1995	S
II-A	UST 5216	Diesel	1945-1995	S
II-A	UST 5217	Diesel	1945-1995	S
II-A	UST 5218	Diesel	1945-1995	S
II-A	UST 5219	Diesel	1945-1995	S
II-A	UST 5220	Diesel	1945-1996	S
II-A	UST 5221	Diesel	1945-1990	S
II-A	UST 5222	Diesel	1945-1996	S
II-A	UST 5223	Diesel	1945-1996	S
II-A	UST 5224	Diesel	1945-1995	S
II-A	UST 5225	Diesel	1945-1995	S
II-A	UST 5226	Diesel	1945-1995	S
II-A	UST 5227	Diesel	1945-1995	S
II-A	UST 5228	Diesel	1945-1995	S
II-A	UST 5229	Diesel	1945-1995	S
II-A	UST 5230	Diesel	1945-1995	S
II-A	UST 5231	Diesel	1945-1995	S
II-A	UST 5232	Diesel	1945-1995	S
II-A	UST 5233	Diesel	1945-1995	S
II-A	UST 5234	Diesel	1945-1995	S
II-A	UST 5235	Diesel	1945-1995	S
II-A	UST 5236	Diesel	1945-1995	S
II-A	UST 5237	Diesel	1945-1990	S
II-A	UST 5238	Diesel	1945-1990	S
II-A	UST 5239	Diesel	1945-1995	S
II-A	UST 5240	Diesel	1945-1990	S
II-A	UST 5241	Diesel	1945-1995	S
II-A	UST 5242	Diesel	1945-1995	S
II-A	UST 579	Fuel Oil	1957-1993	S
II-A	UST 581	Diesel	1945-1993	S
II-A	UST 610	Gasoline	1966-1993	S
II-A	UST 627	Diesel	Unknown-1996	S
II-A	UST 636	Diesel	1969-1997	S
II-A	UST 706	Diesel	1984-1999	S
II-A	UST 762B	Waste Oil	1982-1997	S
II-A	UST 782	Gasoline	Unknown-1997	S
II-A	UST T-10	JP-5	1988-1997	S
II-A	UST T-2	Waste JP-5	1988-1996	S
II-A	UST T-3	Waste JP-5	1988-1996	S
II-A	MSC ST19A	Stored Petroleum Products	Unknown-1999	S
II-A	IRP 6	JP-5, Lubrication oils	Unknown-1999	ND
II-A	IRP 19	JP-5	Unknown-1999	ND

**Attachment 2a: Petroleum Products Notification Table**

<b>Transfer Parcel ID</b>	<b>LOC ID</b>	<b>Petroleum Products*</b>	<b>Dates of Operation</b>	<b>Activities Conducted At Site</b>
<b>Transfer Parcel III-A</b>				
III-A	RFA 9	Unknown	Unknown-1996	S
III-A	UST 24	Diesel	1943-1995	S
III-A	UST 38	Fuel Oil	1943-1995	S
III-A	UST 39	Heating Oil	1948-1999	S
III-A	UST 40	Diesel	1943-1992	S
III-A	UST 41	Diesel	1943-1992	S
III-A	UST 42	Fuel Oil	1943-1992	S
III-A	UST 43	Fuel Oil	1943-1992	S
III-A	UST 241	Diesel	1945-1993	S
III-A	UST 251	Fuel Oil	1944-1997	S
III-A	IRP 13	Crank Case Oil	1997-1983	R

**Notes:**

\* Includes only petroleum products which fall within the scope of the CERCLA petroleum exclusion set forth in CERCLA Section 101(14).

Source: Earth Tech 2003.

**Acronyms/Abbreviations:**

APHO = aerial photograph features/anomalies  
 AST = aboveground storage tank  
 D = Disposal of hazardous material or waste  
 CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act of 1980  
 ID = identification  
 JP-5 = jet propulsion fuel, grade 5  
 LOC = location of concern  
 MSC = miscellaneous  
 ND = Operations at the site are Not Determined  
 OWS = oil/water separator  
 R = Release of Hazardous Material or Waste  
 RCRA = Resource Conservation and Recovery Act  
 RFA = RCRA Facility Assessment  
 S = Storage of hazardous material or waste  
 UST = underground storage tank

## Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
<b>Transfer Parcel I-A</b>									
I-A	N/A	APHO 15	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	9	APHO 22	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	10	APHO 29	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	10	RFA 28	Substances Associated with Fuel Spills	N/A	N/A	N/A	1948-1996	R	N/A
I-A	10	TAA 10	Substances Associated with Materials Storage	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	12	PCB T2	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	14	APHO 23	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	15	APHO 123	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	19	PCB T3	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	50	APHO 5	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	52/692	APHO 124	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	56	Non-Trans 56	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	58	PCB T5	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	59	PCB T6	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	59	PCB T7	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	59	PCB T8	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	60	PCB T9	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	77	TAA 77	Substances Associated with Materials Storage	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	256	APHO 33	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	262	RFA 69	Substances Associated with Stored Drums	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	263	PCB T116	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	264	PCB T34	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	264	PCB T35	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	271	PCB T110	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	271	PCB T111	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	271	PCB T112	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	272	PCB T36	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	272	PCB T37	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	272	PCB T38	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	279	APHO 108	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	279	APHO 40	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	280	OWS 280A	Oily water	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	281	PCB T39	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	281	PCB T40	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	281	PCB T41	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	285	PCB T42	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	285	PCB T43	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	285	PCB T44	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	286	APHO 10	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	289	TAA 289	Solvents, and Substances Associated with less than 90-day accumulation of wastes	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	289	N/A	Ethylbenzene P-Xylene M-Xylene Toluene Perchloroethylene 1,1,1-Trichloroethane O-Xylene	5.80 lbs 2.90 lbs 5.80 lbs 5.80 lbs 5.80 lbs 5.80 lbs 2.90 lbs	100-41-4 106-42-3 108-38-3 108-88-3 127-18-4 71-55-6 95-47-6	N/A N/A N/A U220 U210 U226 N/A	N/A	N/A	174.0 gallons of Solvent
I-A	327	PCB T46	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	327	PCB T47	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	327	PCB T48	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	364	MSC W1	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	364	MSC W2	Mercury (spilled)	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	365	PCB T52	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	382	Non-Trans 382	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	382	PCB T121	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	400 <sup>(c)</sup>	N/A	PCBs	N/A	N/A	N/A	1973-1999	S	N/A
I-A	410	PCB T64	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	410	PCB T65	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	449	PCB T70	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	450	PCB T71	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	451	PCB T72	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	452	PCB T73	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	601	RFA 305	Sewage	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	624	APHO 41	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	625	UST 625	Waste Oil	N/A	N/A	N/A	1967-1999	D	N/A
I-A	625	N/A	Manganese Copper	Unknown Unknown	7439-96-5 7440-50-8	N.E. N.E.	Unknown-1999	Unknown	3.0 lbs of Type 201M Welding Rod

## Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	626	N/A	Ethylbenzene P-Xylene M-Xylene Toluene Perchloroethylene 1,1,1-Trichloroethane O-Xylene	3.23 lbs 1.62 lbs 3.23 lbs 3.23 lbs 3.23 lbs 3.23 lbs 1.62 lbs	100-41-4 106-42-3 108-38-3 108-88-3 127-18-4 71-55-6 95-47-6	N.E. N.E. N.E. U220 U210 U226 N.E.	Unknown-1999	Unknown	97.0 gallons of Solvent
I-A	626	RFA 157	Washwater from vehicles	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	626	OWS 626-1	Oily water, Gasoline	N/A	N/A	N/A	1967-1999	D	N/A
I-A	626	OWS 626-2	Oily water	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	626	OWS 626-3	Oily water	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	626	OWS 626-4	Oily water	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	626	OWS 626-5	Oily water	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	626	TAA 626	Substances Associated with Materials Storage	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	630	PCB T83	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	687	PCB T103	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	687	PCB T104	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	687	PCB T105	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	687	RFA 306	Sewage	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	692	PCB T91	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A



Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	692	PCB T92	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	692	PCB T93	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	733	Non-Trans 733	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	744	N/A	Toulene	1.16	108-88-3	U220	Unknown-1999	Unknown	N/A
			Acetone	1.26	67-64-1	U002			
I-A	744	N/A	P-Xylene	0.11	106-42-3	N.E.	Unknown-1999	Unknown	N/A
			M-Xylene	0.21	108-38-3	N.E.			
			Toulene	0.41	108-88-3	U220			
			Acetone	0.79	67-64-1	U002			
			O-Xylene	0.11	95-47-6	N.E.			
I-A	744	N/A	Ethylbenzene	0.08	100-41-4	N.E.	Unknown-1999	Unknown	N/A
			P-Xylene	0.02	106-42-3	N.E.			
			M-Xylene	0.04	108-38-3	N.E.			
			Toulene	1.34	108-88-3	U220			
			Acetone	0.85	67-64-1	U002			
			O-Xylene	0.02	95-47-6	N.E.			
I-A	744	N/A	Ethylbenzene	0.08	100-41-4	N.E.	Unknown-1999	Unknown	N/A
			P-Xylene	0.04	106-42-3	N.E.			
			M-Xylene	0.08	108-38-3	N.E.			
			Toulene	1.19	108-88-3	U220			
			Acetone	1.02	67-64-1	U002			
			O-Xylene	0.04	95-47-6	N.E.			
I-A	744	N/A	Ethylbenzene	0.00	100-41-4	N.E.	Unknown-1999	Unknown	N/A
			P-Xylene	0.00	106-42-3	N.E.			
			M-Xylene	0.00	108-38-3	N.E.			
			Toulene	0.00	108-88-3	U220			
			Perchloroethylene	0.00	127-18-4	U210			
			1,1,1-Trichloroethane	0.00	71-55-6	U226			
			O-Xylene	0.00	95-47-6	N.E.			

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	744	N/A	Ethylbenzene P-Xylene M-Xylene Toulene Perchloroethylene 1,1,1- Trichloroethane O-Xylene	20.31 10.16 20.31 20.31 20.31 20.31 10.16	100-41-4 106-42-3 108-38-3 108-88-3 127-18-4 71-55-6 95-47-6	N.E. N.E. N.E. U220 U210 U226 N.E.	Unknown-1999	Unknown	N/A
I-A	744	OWS 744	Oil/Oily Water	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	744	TAA 744	Solvents, Paint	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	766	OWS 766A	Oily water	N/A	N/A	N/A	1982-1999	D	N/A
I-A	766	RFA 219	Solvents, Waste Oils	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	766	UST 766B	Waste Oil	N/A	N/A	N/A	1982-1999	D	N/A
I-A	833	PCB T113	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	833	PCB T114	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	833	PCB T115	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
I-A	896	OWS 896	Oily water	N/A	N/A	N/A	1982-1999	D	N/A
I-A	1702	OWS 1702	Oily water	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	N/A	APHO 1	Unknown	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	Bordier's Nursery	APHO 30	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	Bordier's Nursery	N/A	Acetylene	650 ft <sup>3</sup>	74-86-2	N.E.	Unknown-1999	Unknown	N/A
			17% Streptomycin Sulfate	70 lbs	3810-74-0	N.E.			
			5% Phosphoric Acid	1.5 gal	7664-38-2	N.E.			
			8% Soluble Potash	2.4 gal	7447-40-7	N.E.			
			8% Chelated Iron	2.4 gal	12389-75-2	N.E.			
			80% Fosetyl Aluminium	480 lbs	39148-24-8	N.E.			
			0.25% Crystalline Silica	1.5 lbs	14808-60-7	N.E.			
			Aluminium Sulfate	200 lbs	10043-01-3	N.E.			
			Hydra-Methylnon	250 lbs	67485-29-4	N.E.			
			Ammonium Nitrate	16,000 lbs	6484-52-2	N.E.			
			Glycol Ethers	30 gal	26027-38-3	N.E.			
I-A	Bordier's Nursery, continued	N/A	N-Butyl Alcohol	30 gal	71-36-3	N.E.	Unknown-1999	Unknown	N/A
			Oleic Acid	30 gal	112-80-1	N.E.			
			Ancymidol	10 gal	12771-68-5	N.E.			
			Dikegulac Sodium	4 gal	52508-35-7	N.E.			
			55% Avermectin B-1	8.25 gal	65195-55-3	N.E.			
			2.1% Hexanol	0.32 gal	111-27-3	N.E.			
			Penconazole	200 lbs	66246-88-6	N.E.			
			14.3% Propiconazole	20 gal	60207-90-1	N.E.			
			85% Daminozide	80 lbs	1596-84-5	N.E.			
			0.4% Paclobutrazol	40 gal	76738-64-2	N.E.			
			65% Calcium Hypochlorite	200 gal	7778-54-3	N.E.			
			6% Ammonium Nitrate	402 lbs	6484-52-2	N.E.			
			Iprodione	100 lbs	36374-19-7	N.E.			
			Iprodione	20 gal	36734-19-7	N.E.			

## Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	Bordier's Nursery, continued	N/A	5.8% Spinosyn A & D	0.5 gal	131929-60-7	N.E.	Unknown-1999	Unknown	N/A
			88.4% Propylene Glycol	6.2 gal	57-55-6	N.E.			
			5.8% Spinosyn D	0.41 gal	131929-63-0	N.E.			
			Anhydrous Copper Sulfate	100 lbs	7758-99-8	N.E.			
			Chlormequat	25 gal	999-81-5	N.E.			
			Chlorothalonil	100 lbs	1897-45-8	N.E.			
			Metaldehyde	2000 lbs	9002-91-9	N.E.			
			40% Potassium Salt of Fatty Acid	4 gal	N.E.	N.E.			
			60% Alcohol	6 gal	925-93-9	N.E.			
			Diazinon	500 lbs	333-41-5	N.E.			
			48% Diazinon	3.5 gal	333-41-5	N.E.			
			30% Xylene	4.5 gal	64746-95-6	U239			
			15% Emulsifier	2.3 gal	9016-45-9	N.E.			
I-A	Bordier's Nursery, continued	N/A	Bacillus Thuriensis	20 gal	N.E.	N.E.	Unknown-1999	Unknown	N/A
			76-80% Mancozeb	156 lbs	2234-56-2	N.E.			
			10-12% Sodium Lignosulfonate	22 lbs	8061-51-6	N.E.			
			3-4% Sodium Sulfate	7 lbs	7757-82-5	N.E.			
			99% Dolomite	19,800 lbs	16389-88-1	N.E.			
			1% Crystalline Silica	200 lbs	14808-60-7	N.E.			
			S-Kinoprene	2 gal	65733-20-2	N.E.			
			Xylene	2 gal	64792-95-6	U239			
			11.25% Glycine Betaine	0.6 gal	107-43-7	N.E.			
			2% Sodium Citrate	0.1 gal	68-04-2	N.E.			
			2.3% Diethanol Amine	0.1 gal	N.E.	N.E.			

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	Bordier's Nursery	N/A	Exact-Trol	3 gal	N.E.	N.E.	Unknown-1999	Unknown	N/A
			20% Chlorothalonil	22.2 lbs	1897-45-6	N.E.			
			29% Calcium Silicate	32.2 lbs	13983-17-0	N.E.			
			Dinitrosopentamethyl Enetetramine	Unknown	39-36-7	N.E.			
			Prodiamine	24 lbs	29091-21-2	N.E.			
			Ferrous Sulfate	6000 lbs	7782-63-0	N.E.			
			Ethephon	2 gal	16672-87-0	N.E.			
			Thiophanate Methyl	100 gal	23564-05-8	N.E.			
			Styrychnine Alkaloid	10 lbs	57-24-9	N.E.			
I-A	Bordier's Nursery, continued	N/A	Methiocarb	Unknown	2032-65-7	N.E.	Unknown-1999	Unknown	N/A
			Silica	Unknown	14808-60-7	N.E.			
			Talc	Unknown	14807-96-6	N.E.			
			Potassium Salt of Manganese	120 lbs	15708-48-2	N.E.			
			Indole Butiric Acid	12 lbs	133-32-4	N.E.			
			Oxythioquinox	Unknown	196-86-9	N.E.			
			Ingredient 1979	Unknown	N.E.	N.E.			
			Ingredient 1975	Unknown	N.E.	N.E.			
			Diazinon	12 gal	333-41-5	N.E.			
			Magnesium Chelate	50 lbs	N.E.	N.E.			
			Bromadiolone	60 lbs	28772-56-7	N.E.			
			Malathion	Unknown	121-75-5	N.E.			
			Xylene	Unknown	64742-95-6	U239			
			Dipotassium Salt of Manganese	20,000 lbs	10034-96-5	N.E.			

## Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	Bordier's Nursery, continued	N/A	Imidacloprid	Unknown	138261-41-3	N.E.	Unknown-1999	Unknown	N/A
			Silica	Unknown	14808-60-7	N.E.			
			Tau-Fluvalinate	10 gal	102851-06-9	N.E.			
			Imidacloprid	Unknown	138261-41-3	N.E.			
			Cristalline Silica	Unknown	N.E.	N.E.			
			Mercaptodimethur Sodium	30 lbs	2031-65-7	N.E.			
			Methylditiocarbamate	5 gal	137-42-8	N.E.			
			Potassium Salt of Fatty Acid	Unknown	N.E.	N.E.			
			Alcohol	Unknown	925-93-9	N.E.			
			Potassium Chloride	6,000 lbs	7447-40-7	N.E.			
I-A	Bordier's Nursery, continued	N/A	Terramycin	300 lbs	79-57-2	N.E.	Unknown-1999	Unknown	N/A
			Urea	Unknown	57-13-6	N.E.			
			Sulfuric Acid	Unknown	7664-93-9	N.E.			
			Poe Nonylphenols	Unknown	26027-38-3	N.E.			
			Isopropyl Alcohol	Unknown	925-93-9	N.E.			
			Octylphenoxy, Polioethoxy Sodium	Unknown	26027-38-3	N.E.			
			30 lbs	30 lbs	3834-92-0	N.E.			
			Metasiclitate	Unknown	7664-38-2	N.E.			
			Phosphoric Acid	Unknown	7757-79-1	N.E.			
			Potassium Nitrate	Unknown	57-13-6	N.E.			
I-A	Bordier's Nursery, continued	N/A	Urea	Unknown	57-13-6	N.E.	Unknown-1999	Unknown	N/A
			Vinclozolin	4 gal	50471-44-8	N.E.			

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	Bordier's Nursery, continued	N/A	Acephate	80 lbs	30560-19-1	N.E.	Unknown-1999	Unknown	N/A
			Oxyfluorfen	Unknown	42874-03-3	N.E.			
			Pendimethalin	Unknown	40487-42-1	N.E.			
			Phosphoric Acid	100 gal	7664-38-2	N.E.			
			Ammonium Nitrate	Unknown	6484-52-2	N.E.			
			Calcium Phosphate	Unknown	7758-23-8	N.E.			
			Ammonium Phosphate	Unknown	7722-76-1	N.E.			
			Oxygen	750 ft <sup>3</sup>	7782-44-7	N.E.			
			Chlorpyrifos	Unknown	2921-88-2	N.E.			
			Amorphous Silica	Unknown	N.E.	N.E.			
			Dienochlor	30 qts	2227-17-0	N.E.			
			Copper Sulfate Pentahydrate	Unknown	7758-98-7	N.E.			
I-A	Bordier's Nursery, continued	N/A	Tenate, Picrate, Ammoniate, Forhate	Unknown	N.E.	N.E.	Unknown-1999	Unknown	N/A
			Alkyl Dimethyl Ethyl Benzil	Unknown	N.E.	N.E.			
			Ammonium Chloride	Unknown	12125-02-4	N.E.			
			Acephate	Unknown	30560-19-1	N.E.			
			Pipron	5 gal	3478-94-2	N.E.			
			Potassium Nitrate	4,000 lbs	7757-79-1	N.E.			
			Dithio Tepp	Unknown	3689-24-5	N.E.			
			Oxadiazon	Unknown	19668-30-9	N.E.			
			Devrinol	Unknown	18299-99-7	N.E.			
			Liquefied Petroleum Gas	1,000 gal	74-98-6	N.E.			



## Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	Bordier's Nursery, continued	N/A	Resmethrin	Unknown	10453-86-8	N.E.	Unknown-1999	Unknown	N/A
			Dimethyl Ether	Unknown	115-10-6	N.E.			
			Isopropanol	Unknown	67-63-0	N.E.			
			Acepace	Unknown	30560-19-1	N.E.			
			Isopropanol	Unknown	67-63-0	N.E.			
			1,1,1	Unknown	77-55-6	N.E.			
			Trichloroethane						
			Pyrethrins	Unknown	8003-34-7	N.E.			
			Rotenone	Unknown	83-79-4	N.E.			
			Pyrethrins	Unknown	8003-34-7	N.E.			
			Piperonyl Butoxice	Unknown	N.E.	N.E.			
			Petroleum Distillate	Unknown	39-69-4	N.E.			
			Diquat Dibromide	20 gal	85-00-7	N.E.			
I-A	Bordier's Nursery, continued	N/A	Oxadiazon	Unknown	19666-30-9	N.E.	Unknown-1999	Unknown	N/A
			Petroleum Distillate	Unknown	39-69-4	N.E.			
			Oxadiazon	10 lbs	19666-30-9	N.E.			
			Fenarimol	5 gal	60168-88-9	N.E.			
			Sulfur	Unknown	7704-34-9	N.E.			
			Urea	Unknown	57-13-6	N.E.			
			Monoammonium Phosphate	Unknown	7722-76-1	N.E.			
			Saturated Aliphatic Carboxylic Acid	Unknown	N.E.	N.E.			
			Gliocladium Virens	300 lbs	N.E.	N.E.			
			Iron Chelate	60 lbs	12389-75-2	N.E.			
			Micronut						
			Pendimethalin	1,000 lbs	40487-42-1	N.E.			
			Multi Methyl Alkenol	5 gal	120-35-1	N.E.			

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	Bordier's Nursery, continued	N/A	Triazole	Unknown	43121-43-3	N.E.	Unknown-1999	Unknown	N/A
			Ingredient 1878	Unknown	N.E.	N.E.			
			Ingredient 1968	Unknown	N.E.	N.E.			
			Metalaxyl	Unknown	57837-19-1	N.E.			
			Naphtalene	Unknown	91-20-3	N.E.			
			Glycol Derivate	Unknown	107-21-1	N.E.			
			Solvent						
			Sulfuric Acid	Unknown	7664-93-9	N.E.			
			Petroleum Distillate	Unknown	2228-84-0	N.E.			
			Alkyl Aryl	Unknown	N.E.	N.E.			
			Polyoxyethoxy						
			Alkiphenoc Coupler	Unknown	88671-89-0	N.E.			
			Myclobutanil	Unknown		N.E.			
			Aluminium Silicate Dihydrate	Unknown	1332-58-7	N.E.			
I-A	Bordier's Nursery, continued	N/A	Calcium Silicate, Synthetic	Unknown	1344-95-2	N.E.	Unknown-1999	Unknown	N/A
			Bifenthrin	Unknown	82657-04-3	N.E.			
			Propylene Glycol	Unknown	57-56-5	N.E.			
			Fenprothrin	5 gal	39515-41-8	N.E.			
			Cyfluthrin	Unknown	68359-37-5	N.E.			
			Ingredient 1476	Unknown	N.E.	N.E.			
			Ingredient 1968	Unknown	N.E.	N.E.			
			Pentachloronitrobenzene	500 gal	82-68-8	N.E.			
			Pentachloronitrobenzene	5 gal	82-68-8	N.E.			
			Sulfur	250 lbs	7704-34-9	N.E.			
			Clarified	10 gal	8002-65-1	N.E.			
			Hydrophobic						
			Monocalcium Phosphate	10,000 lbs	10103-46-5	N.E.			
			Modified	Unknown	N.E.	N.E.			
			Phthalic/Glyceril Alkyl/Resin						

## Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
I-A	Bordier's Nursery, continued	N/A	1,1,1-Trichloroethane	Unknown	7-55-6	N.E.	Unknown-1999	Unknown	N/A
			Petroleum Distillate	20 gal	64742-34-3	N.E.			
			Hexakis Oxamyl	Unknown	13356-08-6	N.E.			
			Methyl Alcohol	Unknown	23135-22-0	N.E.			
			Mancozeb	Unknown	67-56-1	N.E.			
			Thiophanate Methyl	Unknown	2234-56-2	N.E.			
			Oryzalin	Unknown	23564-05-8	N.E.			
			Benefin	Unknown	19044-88-3	N.E.			
			Cristalline Silica	Unknown	1861-40-1	N.E.			
				Unknown	14808-60-7	N.E.			
I-A	DRMO Yard No. 3	APHO 32	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	DRMO Yard No. 3	APHO 34	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	DRMO Yard No. 3	APHO 58	Unknown	N/A	N/A	N/A	Unknown-1999	D	N/A
I-A	Runways	APHO 83	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	Tank Farm 3	APHO 16	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	N/A	APHO 53	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
I-A	N/A	IRP 20	VOCs, SVOCs, PCBs, Pesticides, Arsenic	N/A	N/A	N/A	Unknown-1999	ND	N/A

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
<b>Transfer Parcel II-A</b>									
II-A	120	APHO 3	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	120	PCB T17	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	120	PCB T18	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	120	PCB T19	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	121	APHO 110	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	129	PCB T22	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	129	PCB T23	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	129	PCB T24	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	132	N/A	Ethylbenzene P-Xylene M-Xylene Toluene Perchloroethylene 1,1,1-Trichloroethane O-Xylene	2.90 lbs 1.45 lbs 2.90 lbs 2.90 lbs 2.90 lbs 2.90 lbs 1.45 lbs	100-41-4 106-42-3 108-38-3 108-88-3 127-18-4 71-55-6 95-47-6	N.E. N.E. N.E. U220 U210 U226 N.E.	Unknown-1999	Unknown	87.0 gallons of Solvent
II-A	136	APHO 2	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
II-A	137	N/A	Ethylbenzene	2.90 lbs	100-41-4	N.E.	Unknown-1999	Unknown	87.0 gallons of Solvent
			P-Xylene	1.45 lbs	106-42-3	N.E.			
			M-Xylene	2.90 lbs	108-38-3	N.E.			
			Toluene	2.90 lbs	108-88-3	N.E.			
			Perchloroethylene	2.90 lbs	127-18-4	U210			
			1,1,1-Trichloroethane	2.90 lbs	71-55-6	U226			
			O-Xylene	1.45 lbs	95-47-6	N.E.			
II-A	137	APHO 35	Substances Associated with less than 90-day accumulation of wastes	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	138	APHO 28	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	138	Non-Trans 138	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	163	RFA 46	Degreasers, Waste Oils	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	165	PCB T25	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	1687	MSC P1	Pesticides	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	1700	RFA 237	Substances Associated with Materials Storage	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	1798	APHO 71	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	1798	APHO 72	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	203	PCB T26	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	203	PCB T27	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A

**Attachment 2b: Hazardous Substances Notification Table**

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
II-A	291	APHO 36	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	294	APHO 85	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	343	RFA 96	Substances Associated with Flammable Cylinder Storage	N/A	N/A	N/A	Unknown - 1986	S	N/A
II-A	358	APHO 97	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	371	PCB T56	PCBs	N/A	N/A	N/A	Unknown-1999	R	N/A
II-A	371	PCB T57	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	371	OWS 371	Oil/Oily Water	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	381	APHO 39	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	384	Non-Trans 384	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	389	RFA 260	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	389	TAA 389A	Substances Associated with Materials Storage	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	389	TAA 389B	Substances Associated with Materials Storage	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	406	PCB T63	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	414	Non-Trans 414	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A

**Attachment 2b: Hazardous Substances Notification Table**

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
II-A	415	APHO 13	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	415	APHO 45	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	415	APHO 48	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	415	APHO 75	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	415	APHO 78	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	415	PCB T66	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	415	RFA 125	Substances Associated with Materials Storage	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	441	TAA 441	Substances Associated with less than 90-day accumulation of waste	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	454	RFA 134	Substances Associated with Materials Storage	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	457	APHO 95	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	458	PCB T75	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	459	RFA 246	Substances Associated with Irrigation	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	460	PCB T76	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	460	PCB T77	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
II-A	461	RFA 136	Solvents	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	461	TAA 461	Substances Associated with less than 90-day accumulation of wastes	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	461	UST 461B	Waste Oil	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	461	OWS 461A	Oil/Oily Water	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	462	TAA 462	Substances Associated with less than 90-day accumulation of wastes	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	462	OWS 462A	Oil/Oily Water	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	462	UST 462B	Waste Oil	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	463	RFA 142	Substances Associated with less than 90-day accumulation of wastes	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	463	N/A	Ethylbenzene P-Xylene Methyl Isobutyl Ketone M-Xylene Toulene Molybdated Carbon Black Methyl Ethyl Ketone O-Xylene	0.44 0.11 88.00 0.22 4.40 1.76 22.00 0.11	100-41-4 106-42-3 108-10-1 108-38-3 108-88-3 --- 78-93-3 95-47-6	N.E. N.E. U161 N.E. U220 N.E. U159 N.E.	Unknown-1999	Unknown	N/A



Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
II-A	463	N/A	Ethylbenzene	0.49	100-41-4	N.E.	Unknown-1999	Unknown	N/A
			P-Xylene	0.12	106-42-3	N.E.			
			M-Xylene	0.24	108-38-3	N.E.			
			Toulene	4.88	108-88-3	U220			
			O-Xylene	0.12	95-47-6	N.E.			
II-A	463	N/A	Ethylbenzene	3.28	100-41-4	N.E.	Unknown-1999	Unknown	N/A
			Isocyanates	196.50	71000-82-3	N.E.			
II-A	463	N/A	P-Xylene	13.65	106-42-3	N.E.	N Unknown-1999	Unknown	N/A
II-A	463	N/A	M-Xylene	27.29	108-38-3	N.E.	Unknown-1999	Unknown	N/A
			Toulene	81.88	108-88-3	U220			
			Methyl Ethyl Ketone	237.84	78-93-3	U159			
			O-Xylene	13.65	95-47-6	N.E.			
II-A	463	UST 463	Diesel	N/A	N/A	N/A	1960-1999	D	N/A
II-A	845	OWS 845	Oil/Oily Water	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	463/845	RFA 141	Solvents, Waste Oil	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	464	MSC P2	Substances Associated with pesticide storage areas	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	464	RFA 245	Pesticides	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	464	PCB T78	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	5014	PCB T96	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	5201	PCB T097	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	5215/5216	PCB T102	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	5240	PCB T098	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
II-A	5417	PCB T099	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	5417	PCB T100	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	5417	PCB T101	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	582	PCB T080	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	619	Non-Trans 619	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	636	TAA 636	Substances Associated with Materials Storage	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	636	PCB T87	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	636	N/A	Methyl Isobutyl Ketone	16.24 lbs	108-10-1	U161	Unknown-1999	Unknown	8.0 gallons of Aliphatic Isocyanate
			Isocyanates	29.23 lbs	71000-82-3	N.E.			
II-A	636	N/A	Ethylbenzene	0.10 lbs	100-41-4	N.E.	Unknown-1999	Unknown	8 gallons of Polyurethane, Type I
			P-Xylene	0.02 lbs	106-42-3	N.E.			
			M-Xylene	0.05 lbs	108-38-3	N.E.			
			O-Xylene	0.02 lbs	95-47-6	N.E.			
II-A	636	N/A	P-Xylene	2.02 lbs	106-42-3	N.E.	Unknown-1999	Unknown	16.25 gallons of Thinner-Air Coating
			M-Xylene	4.03 lbs	108-38-3	N.E.			
			Toluene	12.10 lbs	108-88-3	U220			
			Methyl Ethyl Ketone	35.13 lbs	78-93-3	U159			
			O-Xylene	2.02 lbs	95-47-6	N.E.			
II-A	636	N/A	Toluene	19.69 lbs	108-88-3	U220	Unknown-1999	Unknown	8.50 gallons of Sossure Gloss Black Enamel
			Acetone	21.46 lbs	67-64-1	U002			
II-A	636	N/A	Toluene	12.00 lbs	108-88-3	U220	Unknown-1999	Unknown	4.0 gallons of Sossure Gray
			Ethylene Glycol	2.00 lbs	111-76-2	N.E.			
			Monobutyl Ether						
			Acetone	6.00 lbs	67-64-1	U002			

## Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
II-A	636	N/A	P-Xylene M-Xylene Toluene Ethylene Glycol Monobutyl Ether Acetone O-Xylene	0.50 lbs 1.00 lbs 6.00 lbs 0.08 lbs  10.00 lbs 0.50 lbs	106-42-3 108-38-3 108-88-3 111-76-2  67-64-1 95-47-6	N.E. N.E. U220 N.E.  U002 N.E.	Unknown-1999	Unknown	4.0 gallons of So-Sure Green Lacquer
II-A	636	N/A	Ethylbenzene P-Xylene M-Xylene Toluene Acetone O-Xylene	0.64 lbs 0.16 lbs 0.32 lbs 10.70 lbs 6.84 lbs 0.16 lbs	100-41-4 106-42-3 108-38-3 108-88-3 67-64-1 95-47-6	N.E. N.E. N.E. U220 U002 N.E.	Unknown-1999	Unknown	4.0 gallons of Sosure Olive Green Lacque
II-A	636	N/A	P-Xylene M-Xylene Propylene Glycol Monomethyl Ether Toluene Acetone Dichloromethane O-Xylene	0.43 lbs 0.85 lbs 4.25 lbs  12.75 lbs 29.75 lbs 34.00 lbs 0.43 lbs	16.13 32.25 107-98-2  108-88-3 67-64-1 75-09-2 95-47-6	N.E. N.E. N.E.  U220 U002 N.E. N.E.	Unknown-1999	Unknown	8.50 gallons of So-Sure White Enamel
II-A	636	N/A	Ethylbenzene P-Xylene M-Xylene Toluene Acetone O-Xylene	0.63 lbs 0.32 lbs 0.63 lbs 9.48 lbs 8.18 lbs 0.32 lbs	100-41-4 106-42-3 108-38-3 108-88-3 67-64-1 95-47-6	N.E. N.E. N.E. U220 U002 N.E.	Unknown-1999	Unknown	4.0 gallons of So-Sure Yellow Lacquer
II-A	664	Non-Trans 664	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	686	N/A	Acetylene Oxygen, Compressed Gas	600 ft <sup>3</sup> 600 ft <sup>3</sup>	74-86-2 7782-44-7	N.E. N.E.	Unknown-1999	Unknown	N/A
II-A	711	PCB T123	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
II-A	746	N/A	Lead	0.00	7439-92-1	N.E.	Unknown-1999	Unknown	N/A
II-A	762	UST 762B	Waste Oil	N/A	N/A	N/A	1982-1997	D	N/A
II-A	762	OWS 762A	Oil/Oily Water	N/A	N/A	N/A	1982-1997	D	N/A
II-A	817	RFA 270	Washwater from vehicles	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	817	OWS 817	Oily water	N/A	N/A	N/A	Unknown-1999	D	N/A
II-A	831	N/A	Toluene Acetone	19.69 lbs 21.46 lbs	108-88-3 67-64-1	U220 U002	Unknown-1999	Unknown	8.50 gallons of Sosure Gloss Black Enamel
II-A	831	N/A	Toluene Ethylene Glycol Monobutyl Ether Acetone	12.00 lbs 2.00 lbs 6.00 lbs	108-88-3 111-76-2 67-64-1	U220 N.E. U002	Unknown-1999	Unknown	4.0 gallons of So-Sure Gray
II-A	831	N/A	P-Xylene M-Xylene Toluene Ethylene Glycol Monobutyl Ether Acetone O-Xylene	0.50 lbs 1.00 lbs 6.00 lbs 0.08 lbs 10.00 lbs 0.50 lbs	106-42-3 108-38-3 108-88-3 111-76-2 67-64-1 95-47-6	N.E. N.E. U220 N.E. U002 N.E.	Unknown-1999	Unknown	4.0 gallons of So-Sure Green Lacquer
II-A	831	N/A	Ethylbenzene P-Xylene M-Xylene Toluene Acetone O-Xylene	0.64 lbs 0.16 lbs 0.32 lbs 10.70 lbs 6.84 lbs 0.16 lbs	100-41-4 106-42-3 108-38-3 108-88-3 67-64-1 95-47-6	N.E. N.E. N.E. U220 U002 N.E.	Unknown-1999	Unknown	4.0 gallons of Sosure Olive Green Lacquer

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
II-A	831	N/A	P-Xylene	0.43 lbs	106-42-3	N.E.	Unknown-1999	Unknown	8.50 gallons of So-Sure White Enamel
			M-Xylene	0.85 lbs	108-38-3	N.E.			
			Propylene Glycol	4.25 lbs	107-98-2	N.E.			
			Monomethyl Ether						
			Toluene	12.75 lbs	108-88-3	U220			
			Acetone	29.75 lbs	67-64-1	U002			
			Dichloromethane	34.00 lbs	75-09-2	N.E.			
II-A	831	N/A	O-Xylene	0.43 lbs	95-47-6	N.E.	Unknown-1999	Unknown	4.0 gallons of So-Sure Yellow Lacquer
			Ethylbenzene	0.63 lbs	100-41-4	N.E.			
			P-Xylene	0.32 lbs	106-42-3	N.E.			
			M-Xylene	0.63 lbs	108-38-3	N.E.			
			Toluene	9.48 lbs	108-88-3	U220			
			Acetone	8.18 lbs	67-64-1	U002			
			O-Xylene	0.32 lbs	95-47-6	N.E.			
II-A	841	APHO 66	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	841	APHO 67	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	841	APHO 68	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	854	N/A	Ethylbenzene	0.00 lbs	100-41-4	N.E.	Unknown-1999	Unknown	0.40 gallons of Poly Black 37038
			P-Xylene	0.00 lbs	106-42-3	N.E.			
			Methyl Isobutyl	0.80 lbs	108-10-1	U161			
			Ketone						
			M-Xylene	0.00 lbs	108-38-3	N.E.			
			Toluene	0.04 lbs	108-88-3	U220			
			Molybdated Carbon Black	0.00 lbs	N.E.	N.E.			
			Methyl Ethyl Ketone	0.20 lbs	78-93-3	U159			
			O-Xylene	0.00 lbs	95-47-6	N.E.			
II-A	854	N/A	Ethylene Glycol Monobutyl Ether	0.77 lbs	111-76-2	N.E.	Unknown-1999	Unknown	0.40 gallons of Polyamide Type I Class

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
II-A	854	N/A	P-Xylene	0.01 lbs	106-42-3	N.E.	Unknown-1999	Unknown	0.33 gallons of Gray Polyur 11136 Type I
			M-Xylene	0.02 lbs	108-38-3	N.E.			
			Propylene Glycol	0.03 lbs	107-98-2	N.E.			
			Monomethyl Ether						
			Toluene	0.16 lbs	108-88-3	U220			
			O-Xylene	0.01 lbs	95-47-6	N.E.			
II-A	854	N/A	Propylene Glycol	0.07 lbs	107-98-2	.E.	Unknown-1999	Unknown	0.73 gallons of Poly Black 17038
II-A	854	N/A	Monomethyl Ether				Unknown-1999	Unknown	0.69 gallons of Epoxy Thinner
			Propylene Glycol	1.44 lbs	107-98-2	N.E.			
			Monomethyl Ether						
II-A	856	TAA 856	Methyl Isobutyl Ketone	0.96 lbs	108-10-1	U161	Unknown-1999	D	N/A
			Methyl Ethyl Ketone	2.41 lbs	78-93-3	U159			
			Substances Associated with less than 90-day accumulation of waste	N/A	N/A	N/A			
II-A	Drop Tank Drainage Area 1	APHO 94	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Drop Tank Drainage Area 1	APHO 115	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	DRMO Yard No. 2	APHO 12	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	DRMO Yard No. 3	APHO 21	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	Golf Course	APHO 31	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Golf Course	APHO 43	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A

## Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
II-A	Golf Course	RFA 1	Substances Associated with Scrap Metal	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	Golf Course	RFA 2	Vegetation Piles	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	Golf Course	RFA 297	Substances Associated with Asphalt Pavement Plants	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	Golf Course	APHO 8	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	Horse Stables	APHO 14	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Horse Stables	APHO 47	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	Horse Stables	APHO 69	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Horse Stables	APHO 70	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Horse Stables	APHO 73	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Horse Stables	APHO 74	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Horse Stables	APHO 76	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Horse Stables	APHO 77	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Horse Stables	APHO 79	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Horse Stables	APHO 80	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Horse Stables	APHO 81	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Horse Stables	APHO 82	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
II-A	Magarro Farms	N/A	Malathion	47 gal	121-75-5	N.E.	Unknown-1999	Unknown	N/A
			Abamectin	13 gal	71751-41-2	N.E.			
			Potassium Hydrogen Carbonate	1360 lbs	298-14-6	N.E.			
			Myclobutanil	55 lbs	88671-89-0	N.E.			
			Benomyl	215 lbs	17804-35-2	N.E.			
			Thiram	1080 lbs	137-26-8	N.E.			
			Captan	1700 lbs	133-06-2	N.E.			
			Iprodione	35 gal	36734-19-7	N.E.			
			Iprodione	280 lbs	36734-19-7	N.E.			
			Fenhexamid	340 lbs	126833-17-8	N.E.			
			Apron	7 gal	57837-19-1	N.E.			
			Chloropicrin	3453 lbs	76-06-2	N.E.			
			Methyl Bromide	19025 lbs	74-83-9	N.E.			
			Paraquat Dichloride	20 gal	1910-42-5	N.E.			
			Carbaryl	2400 lbs	63-25-2	N.E.			
II-A	Magarro Farms	N/A	Captan	48 lbs	133-06-2	N.E.	Unknown-1999	Unknown	N/A
			Thiram	10 lbs	137-26-8	N.E.			
			Sulfur	20 lbs	7704-34-9	N.E.			
			Biotrol 4K	10 lbs	68038-71-1	N.E.			
			Abamectin	12 gal	71751-41-2	N.E.			
			Hexythiazox	7 gal	78587-05-0	N.E.			
			Potassium salt of fatty acid	Unknown	N.E.	N.E.			
			Alcohol	Unknown	925-93-9	N.E.			
			Pyrethrins	Unknown	800-34-7	N.E.			
			Rotenone	Unknown	83-79-4	N.E.			
			Carbaryl	2700 lbs	63-25-2	N.E.			
			Chlorpyrifos	43 gal	2921-88-2	N.E.			
			Copper salts of fatty acids and rosin acids	Unknown	61789-22-8	N.E.			
II-A	Magarro Farms	N/A	Hexythiazox	39 lbs	78587-05-0	N.E.	Unknown-1999	Unknown	N/A
			Paraquat Dicloride	20 gal	1910-42-5	N.E.			
			Roundup	20 gal	38641-94-0	N.E.			



## Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
			Metolachlor	5 gal	87392-12-9	N.E.			
			Methyl Bromide	Unknown	74-83-9	N.E.			
			Chloropicrin	Unknown	76-06-2	N.E.			
			Benomyl	Unknown	17804-35-2	N.E.			
			Iprodione	Unknown	36734-19-7	N.E.			
			Propylene Glycol	Unknown	57-55-6	N.E.			
			Myclobutanil						
			Aluminium Silicate	Unknown	88671-89-0	N.E.			
			Dihydrate						
			Calcium Silicate,	Unknown	1332-58-7	N.E.			
			Synthetic						
			Sodium	Unknown	1344-95-2	N.E.			
			Lignosulfonate	Unknown	8061-51-6	N.E.			
II-A	N/A	APHO 87	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	N/A	APHO 90	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	N/A	IRP 6	VOCs, SVOCs, PAHs, Arsenic	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	N/A	IRP 19	VOCs, SVOCs, Arsenic, PCBs	N/A	N/A	N/A	1986-Present	ND	Unit 2 of IRP Site 19 was backfilled with soil contaminated with concentrations of PCBs greater than residential PRGs, with a maximum reported concentration of 20 mg/kg. Clean soil was placed above the contaminated soils which are located at a depth of 11 feet bgs.
II-W	Perimeter Road	APHO 93	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-W	Runways	APHO 100	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
		103							
II-A	Runway 34R	APHO 104	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Runway 34R	RFA 301	Hydraulic Fluid	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	Runway 34R	RFA 302	Hydraulic Fluid	N/A	N/A	N/A	Unknown-1999	S	N/A
II-A	Runways	APHO 83	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Runways	APHO 91	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Runways 34L and 34R	APHO 24	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Runways 34R and 7L	APHO 49	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Tank 459	APHO 102	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Tank Farm 4	APHO 4	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Tank Farm 4	APHO 4	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
II-A	Tank Farm No. 6	PCB T109	PCBs	N/A	N/A	N/A	Unknown-1999	S	N/A

Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
<b>Transfer Parcel III-A</b>									
III-A	25	N/A	Toluene Acetone	20.85 lbs 22.73 lbs	108-88-3 67-64-1	U220 U002	Unknown-1999	Unknown	9.0 gallons of So-Sure Gloss Black Enamel
III-A	25	N/A	P-Xylene M-Xylene Toluene Ethylene Glycol Monobutyl Ether Acetone O-Xylene	0.34 lbs 0.68 lbs 4.05 lbs 0.05 lbs 6.75 lbs 0.34 lbs	106-42-3 108-38-3 108-88-3 111-76-2 67-64-1 95-47-6	N.E. N.E. U220 N.E. U002 N.E.	Unknown-1999	Unknown	2.70 gallons of So-Sure Green Lacquer
III-A	25	N/A	Ethylbenzene P-Xylene M-Xylene Toluene Acetone O-Xylene	0.80 lbs 0.20 lbs 0.40 lbs 13.38 lbs 8.55 lbs 0.20 lbs	100-41-4 106-42-3 108-38-3 108-88-3 67-64-1 95-47-6	N.E. N.E. N.E. U220 U002 N.E.	Unknown-1999	Unknown	5.0 gallons of So-Sure Olive Green Lacquer
III-A	25	N/A	Toluene Methyl Ethyl Ketone	4.09 lbs 0.70 lbs	108-88-3 78-93-3	U220 U159	Unknown-1999	Unknown	1.10 gallons of So-Sure Red
III-A	25	N/A	P-Xylene M-Xylene Propylene Glycol Monomethyl Ether Toluene Acetone Dichloromethane O-Xylene	0.57 lbs 1.13 lbs 5.65 lbs 16.95 lbs 39.55 lbs 45.20 lbs 0.57 lbs	106-42-3 108-38-3 107-98-2 108-88-3 67-64-1 75-09-2 95-47-6	N.E. N.E. N.E. U220 U002 N.E. N.E.	Unknown-1999	Unknown	11.30 gallons of So-Sure White Enamel
III-A	25	N/A	Ethylbenzene P-Xylene M-Xylene Toluene Acetone O-Xylene	0.65 lbs 0.32 lbs 0.65 lbs 9.72 lbs 8.38 lbs 0.32 lbs	100-41-4 106-42-3 108-38-3 108-88-3 67-64-1 95-47-6	N.E. N.E. N.E. U220 U002 N.E.	Unknown-1999	Unknown	4.10 gallons of So-Sure Yellow Lacquer

**Attachment 2b: Hazardous Substances Notification Table**

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
III-A	38	APHO 116	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
III-A	38	APHO 117	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
III-A	East Agua Chinon Wash	RFA 9	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
III-A	Golf Course	APHO 8	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A
III-A	N/A	IRP 13	Crankcase oil.	N/A	N/A	N/A	1977-1983	D	N/A
III-A	N/A	APHO 114	Unknown	N/A	N/A	N/A	Unknown-1999	S	N/A

## Attachment 2b: Hazardous Substances Notification Table

Parcel ID	Building Number	LOC ID	Hazardous Substances <sup>(a)</sup>	Reportable Quantity per year <sup>(b)</sup>	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Notes
<b>Stationwide</b>									
I-A, II-A, III-A	N/A	IRP 25	Metals, Pesticides	N/A	N/A	N/A	Unknown-1999	ND	Major drainages. Metals and pesticides were detected above background concentrations in all drainages except Borrego Canyon Wash.
Station wide	N/A	RFA 12	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A
Station wide	N/A	RFA 247	Unknown	N/A	N/A	N/A	Unknown-1999	ND	N/A

## Notes:

<sup>(a)</sup> This table was prepared in accordance with 40 CFR 373 and 40 CFR 302.4. The substances which do not have chemicals-specific break down (and associated annual reportable quantity) are not listed in 40 CFR 302.4, and therefore have no corresponding Chemical Abstracts Services (CAS) number, no regulatory synonyms, no Resource, Conservation and Recovery Act (RCRA) waste numbers, and no reportable quantities

<sup>(b)</sup> Reportable Quantity

For Buildings with chemical-specific break down and associated reportable quantity, the information was obtained from the Air Emissions Source Survey, Final Submittal, MCAS El Toro (Radian International 1994). The reportable quantity was assumed to be the estimate of the air emissions value that was calculated based on a quantity used during the year 1994. For non-VOCs, the specific chemicals are listed and the quantity is unknown. For Magarro Farms, Bordier's Nursery, and Building 686, chemical-specific break down and associated reportable quantity, was obtained from the Toxic and Hazardous Materials Reporting Form, transmitted from MCAS El Toro Lessees to U.S. Navy (9/24/2001). The reportable quantity is based on the inventory on 9/24/2001.

<sup>(c)</sup> This building has been demolished.

Sources: Earth Tech 2003, Radian 1996.

APHO = aerial photograph anomaly  
bgs = below ground surface  
CFR = Code of Federal Register  
D = Disposal of wastes  
IRP = Installation Restoration Program  
JP = Jet Petroleum  
LOC = location of concern  
mg/kg = milligrams per kilogram  
N/A = not applicable  
ND = Operations at site are Not Determined  
N.E. = not established  
Non-Trans = non-transformer PCB containing equipment

OWS = oily water separator  
PCB = poly-chlorinated biphenyls  
PRG = Preliminary Remediation Goal  
R = Release of hazardous material or waste  
RCRA = Resources Conservation and Recovery Act  
RFA = RCRA facility assessment  
S = Storage of hazardous material or waste  
TAA = temporary accumulation area  
UST = underground storage tank

**Attachment 3**  
**DoD Policies on Asbestos, Lead-Based Paint, and Radon**  
**at Base Realignment and Closure Properties**



## DoD Base Reuse Implementation Manual

# DoD Policies on Asbestos, Lead-Based Paint, and Radon at Base Realignment and Closure Properties

### DOD POLICY ON ASBESTOS AT BASE REALIGNMENT AND CLOSURE PROPERTIES

Department of Defense (DoD) policy with regard to asbestos-containing material (ACM) is to manage ACM in a manner protective of human health and the environment, and to comply with all applicable Federal, State, and local laws and regulations governing ACM hazards.

Therefore, unless it is determined by competent authority that the ACM in the property does pose a threat to human health at the time of transfer, all property containing ACM will be conveyed, leased, or otherwise disposed of as is through the Base Realignment and Closure (BRAC) process.

Prior to property disposal, all available information on the existence, extent, and condition of ACM shall be incorporated into the Environmental Baseline Survey (EBS) report or other appropriate document to be provided to the transferee. The survey report or document shall include:

- reasonably available information on the type, location, and condition of asbestos in any building or improvement on the property;
- any results of testing for asbestos;
- a description of any asbestos control measures taken for the property;
- any available information on costs or time necessary to remove all or any portion of the remaining ACM; however, special studies or tests to obtain this material are not required; and
- results of a site-specific update of the asbestos inventory performed to revalidate the condition of ACM.

Asbestos-containing material shall be remedied prior to property disposal only if it is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time of transfer of the property. This remediation should be accomplished by the active Service organization, by the Service disposal agent, or by the transferee under a negotiated requirement of the contract for sale or lease. The remediation discussed above will not be required when the buildings are scheduled for demolition by the transferee; the transfer document prohibits occupation of the buildings prior to the demolition; and the transferee assumes responsibility for the management of any ACM in accordance with applicable laws.

## DOD POLICY ON RADON AT BASE REALIGNMENT AND CLOSURE PROPERTIES

In response to concerns with the potential health effects associated with radon exposure, and in accordance with the Indoor Radon Abatement provisions of Subchapter III of the Toxic Substances Control Act, 26 U.S.C. 2661 to 2671, the Department of Defense (DoD) conducted a study to determine radon levels in a representative sample of its buildings. In addition, as part of DoD's voluntary approach to reducing radon exposure, DoD has applied the Environmental Protection Agency (EPA) guidelines for residential structures with regard to remedial actions.

DoD policy is to ensure that any available and relevant radon assessment data pertaining to Base Realignment and Closure (BRAC) property being transferred shall be included in property transfer documents.

DoD policy is not to perform radon assessment and mitigation prior to transfer of BRAC property unless otherwise required by applicable law.

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[Previous](#)[Contents](#)[Next](#)

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*Last Updated: 08/15/95*

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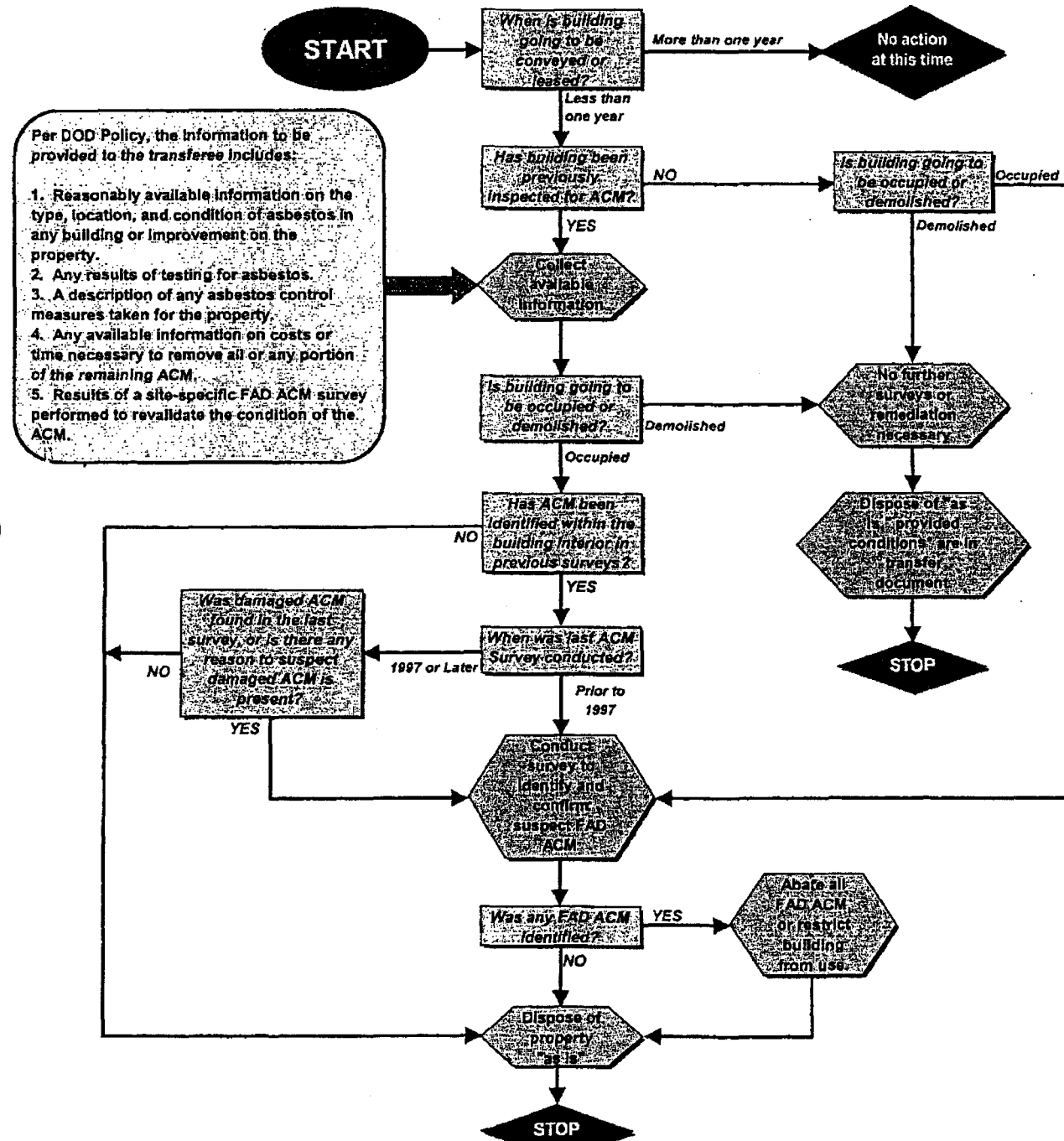
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## DECISION TREE FOR ASBESTOS-CONTAINING MATERIAL SURVEYS

### DOD POLICY ON ASBESTOS AT BRAC PROPERTIES

Prior to property disposal, all available information on the existence, extent and condition of ACM shall be provided to the transferee in an EBS report or other appropriate document. All property containing ACM will be conveyed, leased or otherwise disposed of as is through the BRAC process, unless it is determined by competent authority that the ACM in the property poses a threat to human health at the time of transfer. This flow chart summarizes the steps necessary to comply with the DOD policy on asbestos at BRAC properties.



Unless existing surveys indicate that there is no ACM which poses a threat to human health, the transfer document must prohibit occupation of the buildings prior to the demolition, and the transferee must assume responsibility for the management of any ACM in accordance with applicable laws.



# **Lead-Based Paint Guidelines for Disposal Of Department of Defense Residential Real Property - A Field Guide**

**Interim Final**

**December 1999**

## **Notice**

The policies set forth in this Field Guide are not intended, nor can they be relied upon, to create any rights enforceable in litigation with the United States.

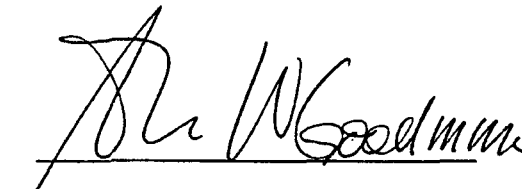
## Foreword

One of the federal government's most complex tasks involves ensuring compliance with varied and often conflicting environmental requirements in returning Department of Defense's excess infrastructure to productive use. An area of particular concern, the laws associated with lead-based paint in transferring federal properties, has the potential to delay this effort.

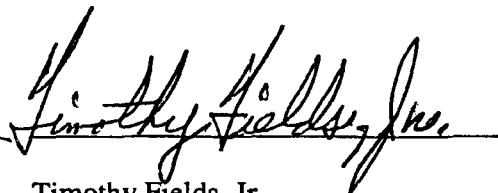
To achieve consistency in the application of the lead-based paint requirements while expediting the availability of property and eliminating possible delays in property transfers, the Department of Defense and United States Environmental Protection Agency, with the assistance of the General Services Administration and the Department of Housing and Urban Development have developed this joint interim final Field Guide. The Field Guide represents a common interpretation of lead-based paint requirements as well as our shared commitment to significantly reduce children's exposures to lead-based paint. Department of Defense and United States Environmental Protection Agency project managers involved in the transfer of residential real property will use the Field Guide as a framework for interpreting the applicable laws and regulations and additional policy requirements imposed by Department of Defense.

The Field Guide requirements are applicable to the transfer of residential real property (housing constructed prior to 1978 and child-occupied facilities), and do not apply to non-residential structures/property, residential real property not intended for residential occupancy or reuse as a child-occupied facility, leased property, or active military housing. This Field Guide is being issued as interim final guidance in that requirements relied upon were derived in part from proposed regulations, but should nonetheless be considered the applicable lead-based paint guidance for Department of Defense residential real property transfer until such time as it is amended upon promulgation of the rules.

The protection of children's health is one of our nation's highest priorities. The Field Guide contributes to the advancement of that priority as local communities begin to put excess Department of Defense facilities to productive uses.



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# Contents

Foreword .....	ii
Acknowledgements .....	iii
List of Figures .....	v
List of Tables .....	vi
Introduction .....	vii
<b>Chapter 1. Applicable Laws, Regulations, and Guidance .....</b>	<b>1</b>
Applicable Federal Statutes .....	1
CERCLA .....	1
Exceptions .....	4
Current Regulations .....	4
Proposed Regulations .....	5
Guidance .....	6
State and Local Laws .....	76
<b>Chapter 2. Lead-Based Paint Evaluation .....</b>	<b>87</b>
Lead-Based Paint Inspection .....	109
Risk Assessment .....	1211
Lead-Based Paint Hazard Criteria .....	1015
<b>Chapter 3. Lead-Based Paint Control and Hazard Abatement Measures .....</b>	<b>1018</b>
Control Measures .....	2221
Abatement .....	2322
Disposal .....	2423
<b>Chapter 4. Property Transfer Process .....</b>	<b>2524</b>
Disclosure .....	2524
Other Documentation Requirements .....	2525
<b>Appendices .....</b>	<b>2827</b>
A. Glossary .....	2828
B. References .....	3433
C. Lead-Based Paint Standards and Test Methods .....	3535
D. Questions & Answers .....	3838
E. DoD Policy and EPA-DoD Agreements .....	4140

## List of Figures

I-1	Field Guide Overview: Lead-Based Paint Decision Process for Transferring DoD Residential Real Property . . . . .	x
1-1	Applicability of Title X of the Residential Lead-Based Paint Hazard Reduction Act . . . . .	3
2-1	The Lead-Based Paint Evaluation Process . . . . .	<del>8</del> 9
2-2	The Lead-Based Paint Inspection Process . . . . .	<del>11</del> 10
2-3	The Risk Assessment Process. . . . .	<del>15</del> 14
3-1	Control and Hazard Abatement Measures . . . . .	<del>21</del> 20

## List of Tables

2-1	Lead-Based Paint Hazard Recognition .....	<del>18</del> 17
3-1	Situations Applicable to Lead-Based Paint Control and Hazard Abatement Measures .....	20 19



## Introduction

Procedures used to address lead-based paint are principally represented by requirements contained in Title X. Title X is the Residential Lead-Based Paint Hazard Reduction Act, a portion of the Housing and Community Development Act of 1992 (42 U.S.C. 4851). Title X amends the Lead-Based Paint Poisoning Prevention Act and the Toxic Substances Control Act (42 U.S.C. 2681). Additionally, when this Field Guide refers to “Title X”, it includes the implementing regulations under TSCA Section 403 and HUD Section 1012/1013. Although EPA concluded that the release of lead to soil from lead-based paint from structures falls within the CERCLA definition of a hazardous substance release, EPA and DoD agree that for the majority of situations involving target housing, Title X is sufficiently protective to address the hazards posed by lead-based paint. (See the DoD-EPA Memorandum in Appendix E).

For federally-owned residential real property<sup>1</sup> subject to disposition<sup>2</sup>, Section 1013 of Title X (42 U.S.C. 4822) requires:

- The inspection, risk assessment, and abatement of lead-based paint hazards in target housing constructed prior to 1960.
- The inspection and risk assessment for target housing<sup>3</sup> constructed between 1960 and 1978.

The regulation implementing Section 1013 of Title X, 24 CFR 35, was issued as a final rule on 15 September 1999 (64 FR 50140). Subparts of the regulation applicable to federally owned facilities are Subparts A, B, C, and R, and include the following requirements:

- Lead-based paint inspections and risk assessments must be performed for all target housing prior to sale/transfer.
- Risk assessments must be performed within 12 months of the date of transfer, and any abatement required must be conducted no later than 12 months after the completion of the risk assessment.

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<sup>1</sup> **Residential real property** is defined as “real property on which there is situated one or more residential dwellings used or occupied, or intended to be used or occupied, in whole or in part, as the home or residence of one or more persons.”

<sup>2</sup> **Disposition**, as the term is used in the Field Guide, means transfer of property, and does not refer to leases, either short or long term, or public/private ventures (PPV).

<sup>3</sup> **Target housing**, a type of residential real property, is “any housing constructed before 1978, except housing designated exclusively for the elderly or persons with disabilities (unless a child younger than 6 years of age also resides, or is expected to reside, in such housing) or any *zero-bedroom dwelling*”.

- The responsibility for abatement may be assumed by the transferee through the transfer agreement.
- Interim hazard standards for painted components, dusts, and soils are established for use until proposed regulations implementing TSCA Section 403 become effective.

In addition, as a matter of policy, the Field Guide contains a number of requirements that exceed both the current Title X regulations and the proposed 403 rule. These requirements represent DoD's commitment to exceed what is strictly required by law to ensure that actions taken are protective of children as established by the 1999 DoD "Lead-Based Paint Policy for Disposal of Residential Real Property" (See Appendix E). Field Guide policy requirements include:

- Soil-lead hazards surrounding target housing constructed between 1960 and 1978 will be abated. The purchaser may be required to perform the soil abatement as part of the transfer agreement.
- Potential soil-lead hazards (bare soils with lead concentrations between 400-2000 ppm (excluding children's play areas<sup>4</sup>)), will be evaluated for the need for abatement, interim controls or no action; the level of action will be determined by the lead-based paint risk assessment.
- Child-occupied facilities (day care centers, preschools, and kindergarten classrooms visited regularly by children under 6 years of age) located on residential real property that will be reused as child-occupied facilities following transfer will be evaluated for lead-based paint hazards. Hazards identified will be abated by the transferee prior to use as a child-occupied facility.
- Target housing that will be demolished and redeveloped as residential real property following transfer will be evaluated by the transferee for soil-lead hazards after demolition of the existing target housing units. Abatement of any soil-lead hazards will be conducted by the transferee prior to occupancy of any newly constructed dwellings.

These requirements expand the application of Title X requirements to include child-occupied facilities providing an added measure of protection for children. The Field Guide also extends Title X abatement requirements to soil-lead hazards surrounding housing constructed between 1960 and 1978, ensuring that all soil-lead hazards are abated regardless of the age of the housing.

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<sup>4</sup> For bare soils in children's play areas, 24 CFR 35, Subpart R defines soil-lead concentrations greater than or equal to 400 ppm as a soil-lead hazard, requiring abatement. (See Chapter 2 and Table 2-1).

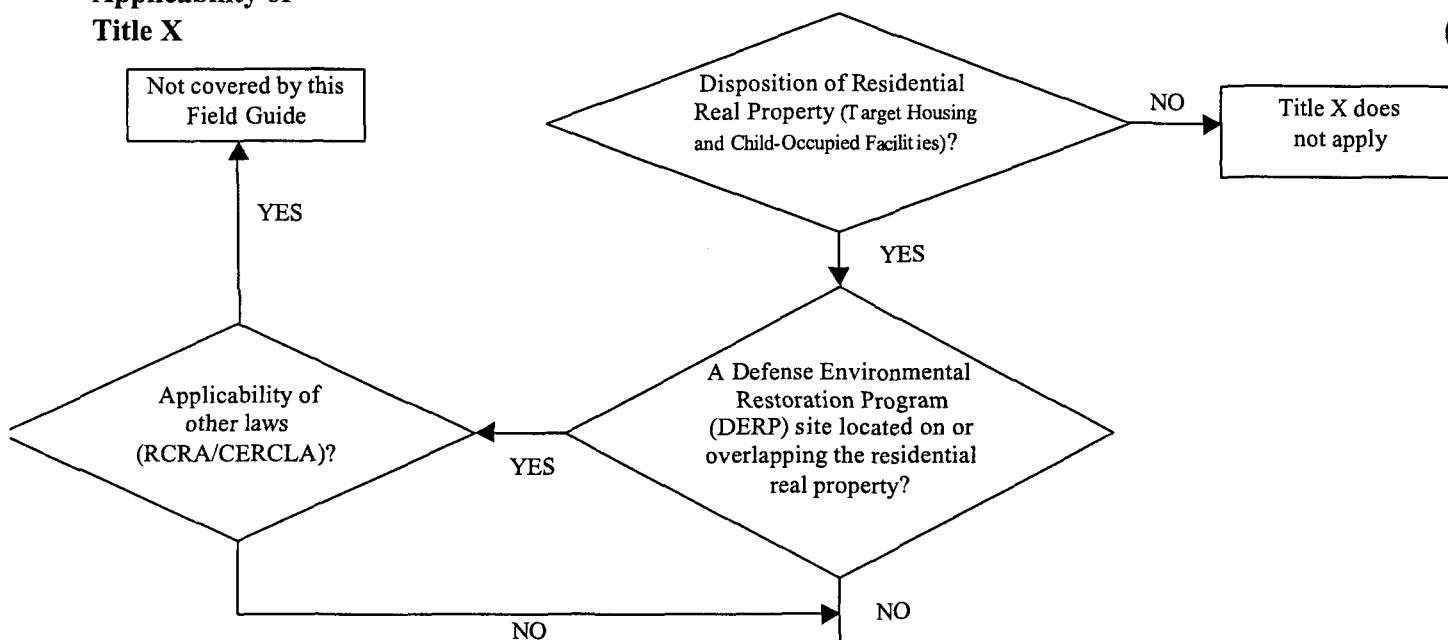
The Field Guide is organized into four chapters illustrating the steps to be followed in the evaluation and control of lead-based paint in DoD owned residential real property subject to disposition (Figure I-1):

- Applicable Laws, Regulations, and Guidance
- Lead-Based Paint Evaluation
- Lead-Based Paint Control and Hazard Abatement Measures
- Property Transfer Process.

Decision diagrams have been included for each step of the process. More detailed procedures describing lead-based paint requirements that are provided elsewhere, such as other guidance and regulations, are highlighted in the text and listed in Appendix B for further reference. The appendices also include a list of media sampling and analysis methods, a glossary of commonly used terms, a question and answer section featuring commonly asked questions about disposal of Title X property, as well as the DoD policy and a letter describing the agreements between EPA and DoD for lead-based paint in DoD residential property transfers.

Note: Throughout this document, terms with definitions provided in the glossary are presented in boldface-italic type.

**Chapter 1  
Applicability of  
Title X**



**Chapter 2  
Lead-Based Paint  
Evaluation**

Conduct a lead-based paint inspection and lead-based paint risk assessment

YES

Lead-based paint hazard identified in soil, paint, or dust?

NO

YES

**Chapter 3  
Lead-Based Paint Control and Hazard Abatement Measures**

No action  
(Note: potential soil-lead hazards may be addressed with interim controls, no action or abatement)

Ensure abatement is conducted prior to transfer or as a condition of transfer  
(only soil-lead hazards are abated in 1960-1978 dwelling units)

**Chapter 4  
Property Transfer Process**

Disclose the presence of lead-based paint and/or lead-based paint hazards

Transfer property

**Figure I-1. Field Guide Overview: Lead-Based Paint Decision Process for Transferring DoD Residential Real Property**

## **Chapter 1:**

### **Applicable Laws, Regulations, and Guidance**

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This section of the Field Guide provides an overview of the applicable regulatory requirements for lead-based paint in DoD residential real property transfers defined by Title X, the Title X implementing regulations, and other relevant requirements. In addition, this section summarizes the relationship of Title X to other laws, such as CERCLA and the Resource Conservation and Recovery Act (RCRA) as well as other lead-based paint guidance developed by EPA and HUD. Figure 1-1 depicts the general applicability of lead-based paint requirements in DoD residential real property transfer, including the relationship to CERCLA. Note: Actions included in the Field Guide that exceed Title X requirements are provided as a matter of policy.

#### **APPLICABLE FEDERAL STATUTES**

Lead-based paint activities in residential areas are governed by the Residential Lead-Based Paint Hazard Reduction Act, commonly known as Title X of the Housing and Community Development Act of 1992, 42 U.S.C. 4822. Title X requires federal departments and agencies to address the threat of lead poisoning from lead-based paint in residential real property. Section 1003 of the Title X statute (42 U.S.C. 4851(a)(6)) states as one of the seven purposes of the legislation that Congress intends “to reduce the threat of childhood lead poisoning in housing owned, assisted, or transferred by the Federal Government.” Section 1013 of Title X which amended the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4822(a)(3) “requires the inspection and abatement of lead-based paint hazards in all federally owned target housing constructed prior to 1960,” as well as “inspection for lead-based paint and lead-based paint hazards in all federally owned target housing constructed between 1960-1977.” Sections 1012 and 1013 of Title X require HUD to promulgate regulations for the performance of inspections, risk assessments, interim controls, and abatement of lead-based paint hazards in federally-owned target housing and target housing receiving federal assistance. Section 1018 includes requirements for disclosure of known lead-based paint and lead-based paint hazards before sale or lease of federally owned, federally assisted, and privately owned target housing. Title X also amended the Toxic Substances Control Act (TSCA) (15 U.S.C. 2681), adding provisions for the development of regulations for identifying lead-based paint hazards on residential property (Section 403), including standards for dust and soil. Training and certification for persons involved in lead-based paint activities is authorized under Section 402 (15 U.S.C. 2680). TSCA Section 408 (15 U.S.C. 2688) also contains a waiver of sovereign immunity subjecting the federal government to state laws and regulations.

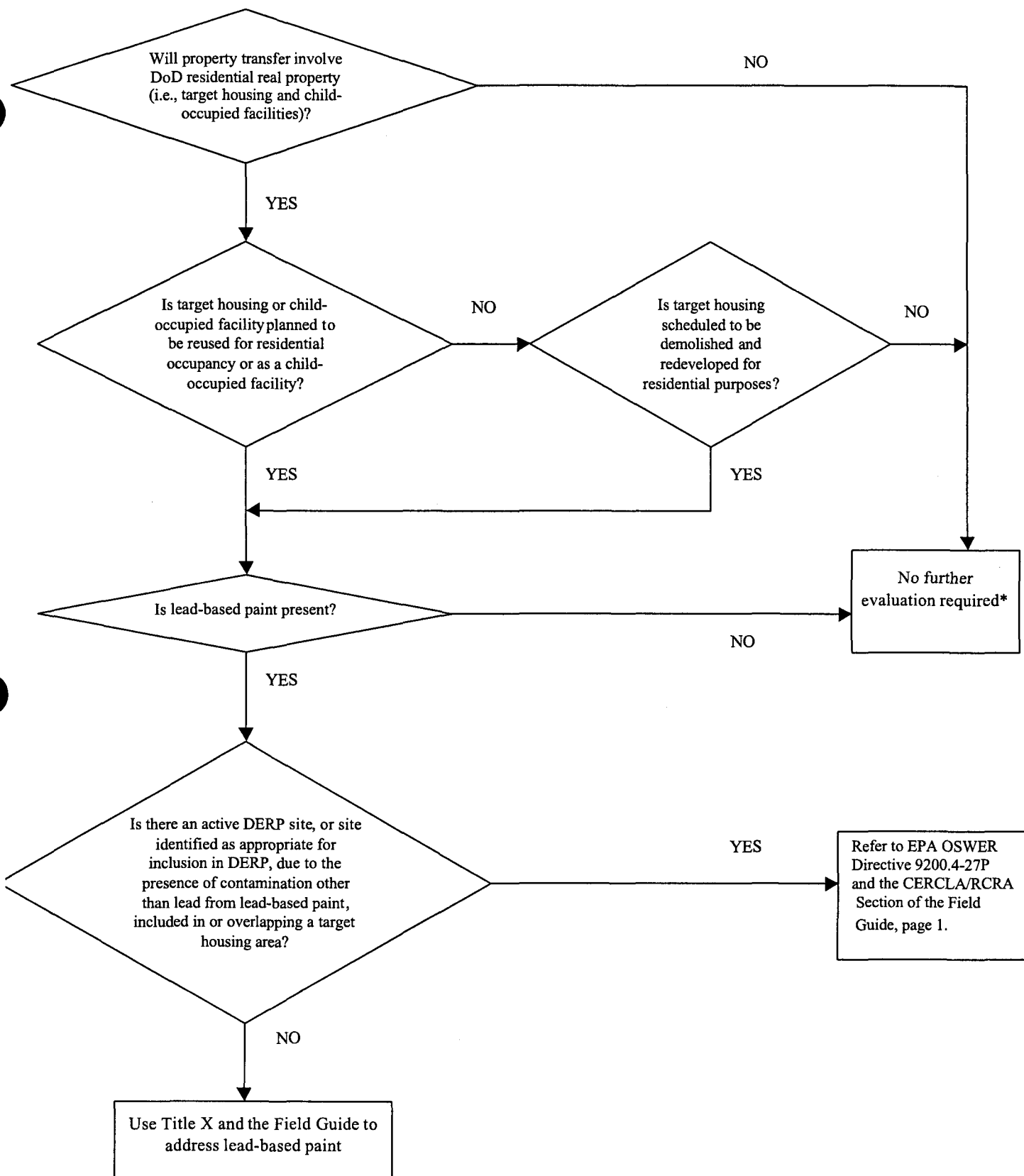
#### **CERCLA**

DoD has an ongoing program, the Defense Environmental Restoration Program (DERP), to identify, assess, investigate, and cleanup contamination from hazardous substances, pollutants, and wastes resulting from past activities at operational installations and Formerly Used Defense Sites (FUDS) where DoD is the principal responsible party. Although EPA concluded that the release of lead to soil from lead-based paint from structures falls within the CERCLA definition of a hazardous substance release, EPA and DoD agree that for the majority of situations involving target housing, Title X is sufficiently protective to address the hazards posed by lead-based paint.

However, lead contamination in soil will be evaluated in accordance with CERCLA/RCRA guidance if a site (the areal extent of contamination) is included in or overlapping a target housing area that is either already being addressed under CERCLA or RCRA as part of the DERP, or has been identified as appropriate for inclusion in the DERP, due to the presence of contamination other than lead-based paint. (See Figure 1-1). Groundwater contamination will not be considered in the determination of CERCLA/RCRA applicability unless the source of groundwater contamination is located in the target housing area. In addition, no further action will be required to address lead in soil from lead-based paint at sites where evaluation and response of soil contamination have been previously completed under either the DERP or Title X unless new regulatory standards that are generally applicable to all parties are promulgated.

When CERCLA or RCRA are being used, the EPA Office of Solid Waste and Emergency Response (OSWER) guidance 9200.4-27P "Clarification to the 1994 Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities" (August 1998) should be consulted for information regarding investigation and remediation requirements. All other target housing areas should be evaluated in accordance with Title X and the criteria included in this Field Guide.

Note: DoD requires that structures (water towers, bridges, and communication towers) located in or adjacent to residential areas be included as part of the targeted residential soil sampling as defined by Title X and the HUD Guidelines. See Chapter 2 of this Field Guide.



**Figure 1-1. Applicability of Title X of the Residential Lead-Based Paint Hazard Reduction Act**

\*This neither exempts such areas from the DERP with respect to the presence of contamination other than lead from lead-based paint, nor creates requirements for such areas under the DERP.

## EXCEPTIONS

The Field Guide lead-based paint requirements are only applicable to circumstances involving the transfer of DoD residential real property. Affected residential real property includes: child-occupied facilities located on residential real property, target housing, and target housing planned to be demolished following transfer and redeveloped for residential use. The requirements contained in the Field Guide do not apply to the following types of property:

- Property not scheduled to be transferred.
- Structures not contained within the definition of residential real property. Residential real property does not include schools, shopping malls, churches, barracks, or other non-residential structures.
- Residential dwellings constructed after 1 January 1978.
- Housing designated exclusively for the elderly or persons with disabilities (unless a child younger than 6 years of age also resides, or is *expected to reside* in such housing) or any zero-bedroom dwelling (such as barracks).
- Leased property or other property not subject to disposition
- Residential real property not intended for residential occupancy or use as a child-occupied facility following transfer.
- Residential real property included in transfer agreements executed prior to the effective date of the DoD Lead-Based Paint Policy for Disposal of Residential Real Property. Services must still meet any promulgated regulatory requirements applicable to the disposition of real property in effect on the date of the disposition of the property.

## CURRENT REGULATIONS

Current regulations governing lead-based paint activities include the following:

- 24 CFR Part 35, Subpart A (HUD), and 40 CFR Part 745, Subpart F (EPA), “Disclosure of Known Lead-Based Paint and Lead-Based Paint Hazards upon Sale or Lease of Residential Property”. Under Section 1018 of Title X, EPA and HUD jointly issued disclosure requirements. Sellers and lessors of target housing must disclose the presence of known lead-based paint and/or lead-based paint hazards in the housing, including providing any available records or reports, and provide a lead hazard information pamphlet. They are also required to attach to the sales contract or lease a form that contains, in addition to disclosure, a lead warning statement and signature lines. Sellers must also provide buyers with a 10-day opportunity to conduct a lead-based paint inspection or risk assessment.
- 24 CFR 35 et al., “Requirements for Notification, Evaluation, and Reduction of Lead-Based Paint Hazards in Federally Owned Residential Property and Housing Receiving Federal Assistance,” (64 FR 50140), effective 15 September 2000, implements sections 1012 and 1013 of Title X. Subpart B includes general requirements applicable to all subparts. Subpart C establishes procedures for the disposition of federally owned residential property. Subpart R provides methods and standards to be used for evaluation and abatement activities conducted under Subparts B, C, D, and F through Subpart M, and includes “interim hazard standards” for paint, dust, and soil to be used until standards contained in the proposed TSCA 403 regulation are effective.



- 40 CFR Part 745, Subpart E, "Residential Property Renovation" effective June 1, 1999, requires individuals paid to perform renovations on target housing to provide a lead hazard information pamphlet to the owner/occupant prior to commencing any renovation activities, as required under TSCA Section 406.
- 40 CFR Part 745, Subpart L, "Lead-Based Paint Activities" effective March 1, 2000 (64 FR 42849), includes both training and certification requirements for persons involved in lead-based paint activities in target housing, as well as work practice standards for conducting lead-based paint inspections, risk assessments, and abatement activities as required by Section 402 of TSCA. Subpart L also references the procedures contained in the HUD Guidelines and the TSCA guidance.
- 40 CFR Part 745, Subpart Q, "State and Indian Tribal Programs". The regulation establishes requirements for State or Tribal programs under Section 404 of TSCA, for authorization to administer and enforce regulations developed under TSCA Section 402.
- 29 CFR §1926.62, Occupational Safety and Health Administration (OSHA) Regulations, "Lead Exposure in Construction." Section 1926.62 applies to all construction activities in which employees might be exposed to lead and all related construction activities currently excluded from the general industry standard for lead (29 CFR §1910.1025).
- 40 CFR Part 261, Subpart B, "Criteria for Identifying the Characteristics of Hazardous Waste and for Listing Hazardous Waste." This regulation defines chemical testing requirements used to characterize wastes for disposal under the Resource Conservation and Recovery Act (RCRA).

## PROPOSED REGULATIONS

Regulations implementing Title X that have been proposed but are not yet final include:

- The proposed TSCA regulation "Identification of Dangerous Levels of Lead" (63 FR 30302) establishes lead-based paint hazard standards under section 403 of TSCA for painted surfaces, dusts, and soils.
- Proposed TSCA regulation, "Management and Disposal of Lead-Based Paint Debris", (63 FR 70189) and the proposed RCRA regulation, "Temporary Suspension of Toxicity Characteristic Rule for Specified Lead-Based Paint Debris" (63 FR 70233). Currently, lead-based paint wastes which fail testing required under the Toxicity Characteristic (TC) Rule (40 CFR 261.24) must be disposed of as hazardous waste. The proposed RCRA regulation would suspend the RCRA testing and disposal requirements for certain types of lead-based paint debris generated during abatements, deleading projects at public or commercial buildings, and renovation or remodeling and demolition activities at target housing, public buildings or commercial buildings. Instead, debris such as lead-based painted architectural component debris and lead-based paint demolition debris would be managed as non-hazardous solid waste in accordance with the proposed TSCA disposal requirements.

When the regulations are promulgated, the work practices, hazard standards, and disposal requirements they contain will become requirements. Any changes in the final rules will be incorporated into subsequent versions of this Field Guide. In the interim, hazard criteria included in this Field Guide incorporate the requirements of 24 CFR 35 and the language and intent of the proposed Section 403 regulation. Field Guide waste management requirements reference only the current RCRA regulations.

## **GUIDANCE**

There are two primary guidance documents currently recommended for lead-based paint activities:

- HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, June 1995 (including the September 1997 revision of Chapter 7: Lead-Based Paint Inspection).
- EPA Interim Guidance on the Identification of Lead-Based Paint Hazards, 60 FR 47248, September 11, 1995.

The HUD Guidelines provide detailed procedures to be used for performing inspections, risk assessments, interim controls, and abatement, and are referenced throughout the Field Guide. The HUD Guidelines, Chapter 5, "Risk Assessment", and Chapter 15, "Clearance", are scheduled to be revised. The HUD Guidelines can be downloaded from the HUD Office Lead Hazard Control Internet home page at <http://www.hud.gov/lea/learules.html>. EPA is in the process of developing guidance to implement the proposed TSCA 403 rule, which will eventually replace the 1995 interim guidance. The TSCA guidance can be obtained from the EPA Lead Programs home page at <http://www.epa.gov/opptintr/lead/index.html>. Army, Navy, and Air Force are also developing guidance to supplement Field Guide requirements consistent with DoD lead-based paint policy.

## **STATE AND LOCAL LAWS**

TSCA (15 U.S.C. 2688) contains a waiver of sovereign immunity for state and local laws relating to lead-based paint and lead-based paint activities. Most states now have authorized programs under 40 CFR Part 745, Subpart Q, defining training and certification requirements for inspectors, risk assessors, and abatement contractors involved in lead-based paint activities. Authorized programs may include standards for lead-based paint that may be more stringent than current federal regulations, the proposed TSCA 403 rule standards, or Field Guide requirements. States may also have specific testing and disposal requirements for lead-based paint waste and debris generated during abatement and demolition activities. Lead-based paint evaluation and abatement activities and disposal of lead-based paint debris must comply with promulgated state requirements.

Local interest from communities, Land Reuse Authority, the BRAC Cleanup Teams, as well as prospective purchasers may also have some bearing on decisions made by DoD on property transfer issues, such as lead-based paint. In addition, where lead-based paint is associated with historic residential properties, state historic preservation offices should also be consulted regarding acceptable abatement requirements for planned restoration activities of historic properties.

## Chapter 2:

### Lead-Based Paint Evaluation

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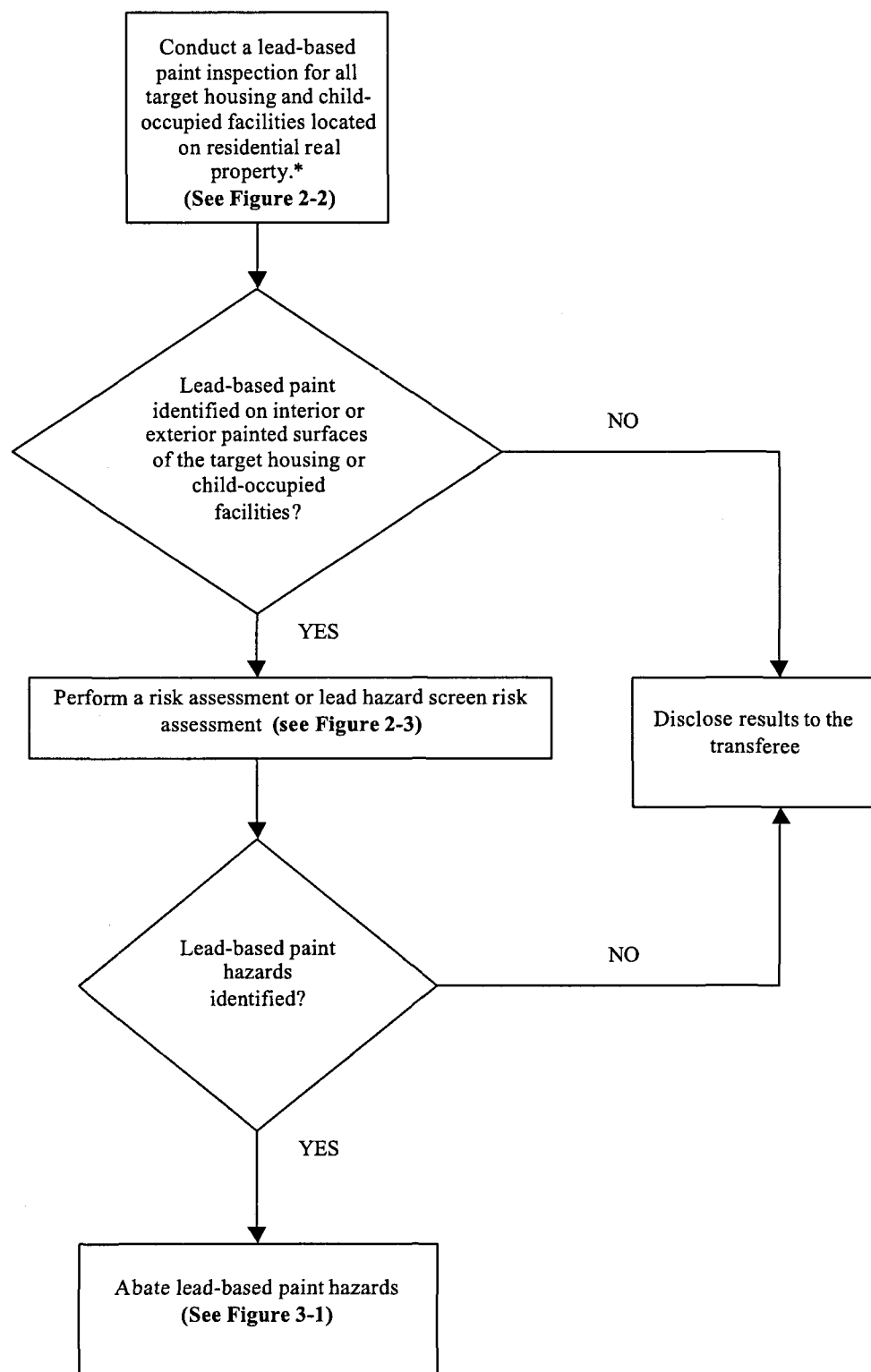
The term *evaluation* means an inspection and a risk assessment and can also include a lead-hazard screen, paint testing, or a combination of these to determine the presence of lead-based paint hazards or lead-based paint. The lead-based paint inspection is used to establish the presence or absence of lead-based paint on interior and exterior surfaces. The risk assessment is conducted to assess whether painted surfaces, dusts, and soils represent lead-based paint hazards and recommend options for hazard abatement.

24 CFR 35, Subpart C requires a lead-based paint inspection, risk assessment, and abatement of lead-based paint hazards in federally owned target housing constructed prior to 1960 and an inspection for lead-based paint and risk assessment for lead-based paint hazards in federally owned target housing constructed between 1960 and 1977. Both the lead-based paint inspection and risk assessment are required to be performed prior to transfer, with the risk assessment conducted no more than 12 months prior to transfer.

DoD policy requires that child-occupied facilities located on residential real property be evaluated in the same manner as target housing. Target housing that will be demolished and redeveloped for residential use following transfer does not require either an inspection or risk assessment, but DoD policy requires soils be evaluated by the transferee after demolition and prior to occupancy of any newly constructed units.

The lead-based paint inspection will usually precede the risk assessment. The results of the inspection are used in the risk assessment in the evaluation of lead-based paint hazards. However, military services may elect to combine the lead-based paint inspection and risk assessment into one evaluation. As shown in Figure 2-1, if the lead-based paint inspection indicates the absence of lead-based paint on the exterior and interior surfaces of the property, a risk assessment is not required, and no further action is necessary. Accordingly, if lead-based paint hazards are not identified in the risk assessment, no further action other than disclosure is required. The presence of lead-based paint should be established prior to conducting the risk assessment.

EPA's 40 CFR Part 745, Subpart L, "Work Practice Standards for Conducting Lead-Based Paint Activities," provides minimum requirements for conducting lead-based paint inspections and risk assessments, and references detailed requirements contained in the 1995 EPA TSCA guidance and the HUD Guidelines. All lead-based paint inspections and risk assessments should be conducted by a *certified* inspector or risk assessor, respectively, in accordance with TSCA Section 402, state, and local requirements. The certified individual and the responsible military Service must retain copies of the inspection and risk assessment reports for a minimum of three years. As discussed in Chapter 4, the results of lead-based paint inspections and risk assessments are disclosed to the transferee in the transfer agreement.



**Figure 2-1. The Lead-Based Paint Evaluation Process**

\*A lead-based paint inspection and risk assessment are not required to be performed for housing that will be demolished. However, soils are required to be evaluated and abated by the transferee following demolition and prior to occupancy of any newly constructed dwelling units.

## LEAD-BASED PAINT INSPECTION

A *[lead-based paint] inspection* is a surface-by-surface investigation to determine the presence of lead-based paint and the provision of a report explaining the results of the investigation. 24 CFR 35, Subpart C and DoD policy requires that a lead-based paint inspection be performed for all target housing and child-occupied facilities located on residential real property. 40 CFR Part 745, Subpart L requires that lead-based paint inspections be performed by a certified inspector and in accordance with the procedures contained in 40 CFR 745.227 and Chapter 7 of the HUD Guidelines, (revised September 1997).

An inspection is used to inventory the painted surfaces of the interior and exterior of a dwelling unit. The inventory involves testing of all of the "testing combinations," which are distinct combinations of building components, substrates, and locations (room, hallway, exterior, etc.). (Because of their large area, at least four walls are tested in each room or room equivalent.) The inspector is responsible for characterizing the distinct components for which testing may be required. Certain adjacent building components that are not likely to have different painting histories can be grouped together in a single testing combination (HUD Guidelines, Chapter 7, rev. 1997, [http://www.hud.gov/lea/chap7\\_2.pdf](http://www.hud.gov/lea/chap7_2.pdf)). For multi-family housing with similarly constructed dwelling units, the inspector will select units, common areas, and exterior areas for testing to represent conditions in all units and common areas, in accordance with the sampling strategy provided in the HUD Guidelines, Chapter 7 (see, especially, Table 7.3). Components replaced after 1977 or known not to contain lead-based paint do not require inspection.

Portable x-ray fluorescence (XRF) analyzers combined with laboratory analysis of paint samples are used to determine the presence of lead-based paint. The XRF is the most commonly used inspection method because it provides immediate results, is economical to use, and sampling does not disturb the painted surface. The XRF must be operated in accordance with the instrument's performance characteristic sheet (PCS), the manufacturer's recommendations, and the HUD Guidelines, Chapter 7. The XRF cannot be used on deteriorated or irregular surfaces. Paint chip sampling must be used when paint on deteriorated or irregular surfaces must be tested, and as confirmation for inconclusive XRF results. A paint chip sample includes all layers of paint on a tested component. Paint chip samples are required to be analyzed at laboratories recognized by EPA under the National Lead Laboratory Accreditation Program (NLLAP) as being capable of performing analyses for lead in paint, dust, and/or soil samples, as applicable to the sample being analyzed. (40 CFR 745.227(f)(2) and the HUD Guidelines, Chapter 7).

If lead-based paint is identified, a lead-based paint risk assessment should be conducted consistent with the recommendations and requirements provided in the next section and Chapter 5 of the HUD Guidelines. If no lead-based paint is detected, no further action is required (24 CFR 35.115 (a)(4)). The inspector should document all findings in an inspection report, as described in Chapter 7 of the HUD Guidelines. See Figure 2-2 for an overview of the lead-based paint inspection process.

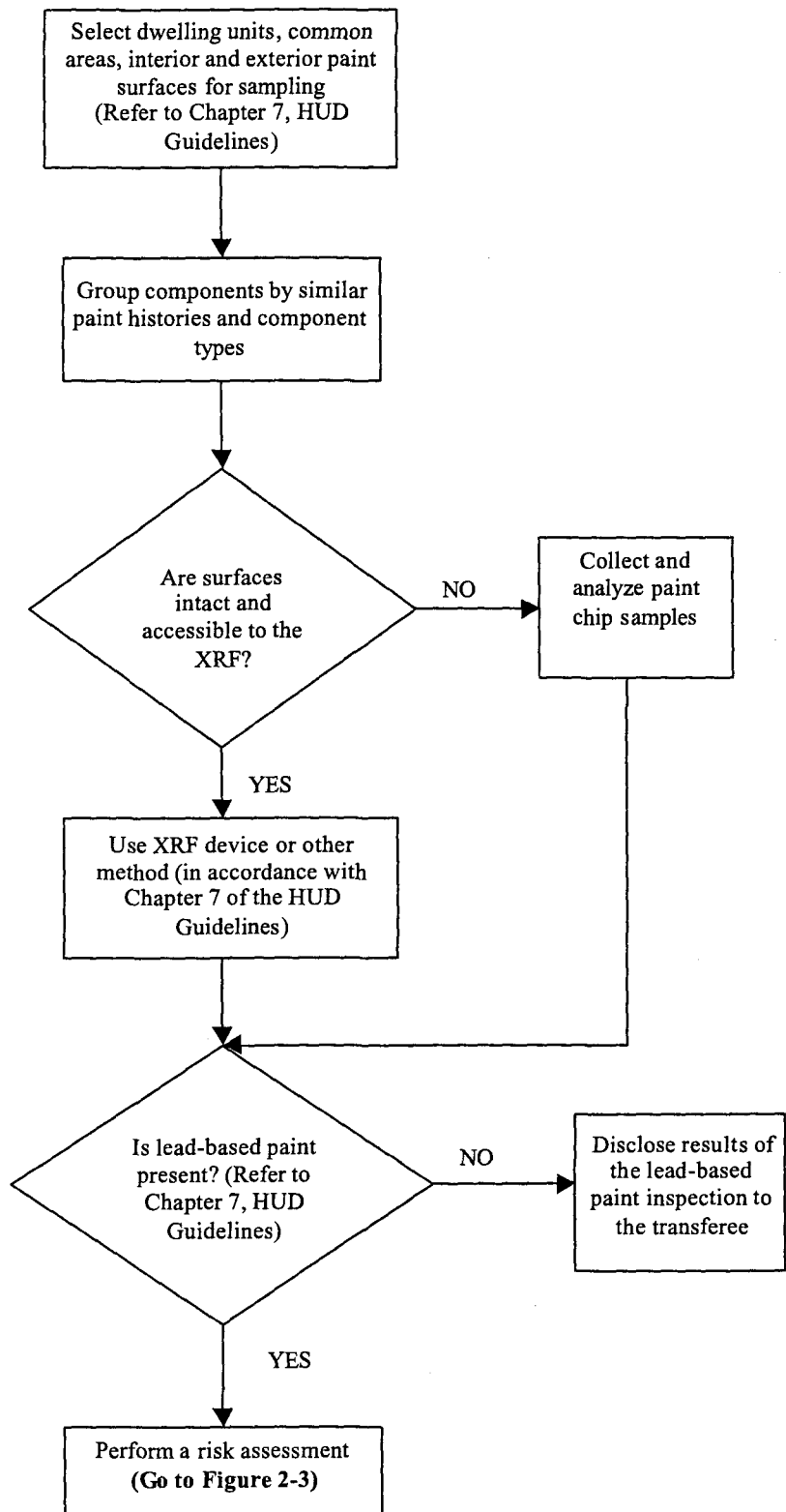


Figure 2-2. The Lead-Based Paint Inspection Process

## RISK ASSESSMENT

A *risk assessment* is an on-site investigation to determine and report the existence, nature, severity, and location of lead-based paint hazards in residential dwellings [on painted surfaces in the interior and on the exterior of the dwelling, in interior dusts, and in soils on the residential property]. (HUD Guidelines, Chapter 5, <http://www.hud.gov/lea/leach5.pdf>). 24 CFR 35.165(b)(1), requires that a “risk assessment must be no more than 12 months old to be considered current”, in which case the risk assessment must be conducted no more than 12 months prior to disposition. The risk assessment can be a separate study performed after a lead-based paint inspection, a *lead hazard screen* assessment, or may be combined with the lead-based paint inspection. An EPA certified risk assessor or an individual certified by an authorized state program must conduct the risk assessment.

A lead hazard screen risk assessment may be appropriate if, based on-site history and other features; the residential dwelling is unlikely to contain lead-based paint hazards. The lead hazard screen usually involves limited paint and dust sampling but can also include soil sampling. If no lead-based paint hazards are identified during the lead hazard screen risk assessment, no further action is required. However, if lead-based paint hazards are found or are suspected to be present, a full risk assessment should be performed to define specific surfaces/media requiring abatement. The sampling results from the lead hazard screen may be used to supplement sampling required for the risk assessment. The evaluation and reporting process for the lead hazard screen risk assessment is similar to the risk assessment requirements discussed below. Note: the value of the *dust-lead hazard* standard used in the lead hazard screen is less than the standard used in the risk assessment. (See the glossary definition and Table 2-1.) A risk assessment consists of the following general steps:

- An evaluation of the history and background of the target housing or child-occupied facility, including a review of available information on the age and history of the structures, occupancy by children under the age of six, and the physical characteristics of the building.
- A visual inspection to determine the presence, location, and extent of *deteriorated paint* and other lead-based paint hazards. The visual inspection also includes an assessment of probable use patterns that could result in exposure to lead-based paint.
- Sampling of paint, dust, and soil media.
  - Testing of each deteriorated painted surface with a distinct painting history that has been identified as containing lead-based paint. The lead-based paint inspection should be consulted in determining the need for any additional painted surface samples. Either the XRF or paint chip sampling may be used to evaluate painted surfaces. All paint chip, dust, and soil samples must be analyzed by laboratories recognized by EPA through the NLLAP as described in 40 CFR 745.227(f)(2).
  - Collection of dust wipe samples, either composite or single surface samples, from interior windowsills and floors in all living areas where young children are most likely to come into contact with dust. Dust wipe samples should be collected from

window sills and floors in all living areas where one or more children, age 6 and under, are most likely to come into contact with dust. For multi-family property dwellings and child-occupied facilities dust samples should also be collected from windows and floors in common areas. More detail regarding dust-sampling protocols can be found in the HUD Guidelines, Chapter 5, and 40 CFR §745.227.

- Collection of *composite soil samples* from the first ½ inch of soil from the dripline/foundation and the midyard areas where *bare soil* is present. Composite sampling procedures are defined in the HUD Guidelines, Chapter 5. Sampling requirements include:
  - Two composite samples collected from bare soil areas in the midyard and dripline respectively. Each composite sample is made up of two or more subsamples but not to exceed 10 subsamples.
  - Separate composite samples collected from bare soils in children's *play areas*.

The *arithmetic mean*, or the average of the composite samples, is used to define a yardwide average of soil lead concentrations. If the arithmetic mean of the composite samples is equal to or exceeds the hazard standard of 2,000 ppm in bare soils (bare soil areas must exceed 9 square feet) or 400 ppm in children's play areas, additional sampling may be required to define the extent of soil requiring abatement. The results of the midyard or dripline composite sampling may be used to target areas of bare soils for additional sampling. For target housing scheduled to be demolished and redeveloped for residential use after transfer, the transferee will be responsible for evaluating and abating any soil-lead hazards. The transfer agreement should specify that soil sampling be conducted after demolition and removal of demolition debris and prior to occupancy of any newly constructed dwelling units in a manner consistent with Title X and the HUD guidelines.

- Evaluation of all sampling data, background information, findings from the visual assessment, and management and maintenance information against the lead-based paint hazard criteria in Table 2-1, to determine the presence or likelihood of exposure by children to lead-based paint hazards in dusts, soils, painted surfaces and potential hazards in soils (soil lead concentrations between 400 and 2,000 ppm (excluding children's play areas)).
- Preparation of a risk assessment report documenting all sampling data, related lead-based paint hazards, and recommended options for control and/or hazard abatement.

The risk assessment may use several different sampling strategies for multi-family dwellings, including *targeted*, *worst-case*, or *random sampling* of dwelling units for housing with five or more dwelling units, as defined in Chapter 5 of the HUD Guidelines. The facility should select a sampling strategy on the basis of the desired degree of confidence, economic factors, and the availability of historical construction and maintenance records, in accordance with the HUD Guidelines or other documented EPA methodologies.



If the condition of painted surfaces and concentrations of lead in paint and other media do not exceed the hazard criteria as either a lead-based paint hazard or a potential hazard, as described in Table 2-1, then no further action is required. Identified lead-based paint hazards must be abated. Potential soil-lead hazards may be addressed through interim controls, no action, or abatement, as determined by the criteria discussed on page 17 and Table 2-1. Figure 2-3 provides an outline of the risk assessment process.

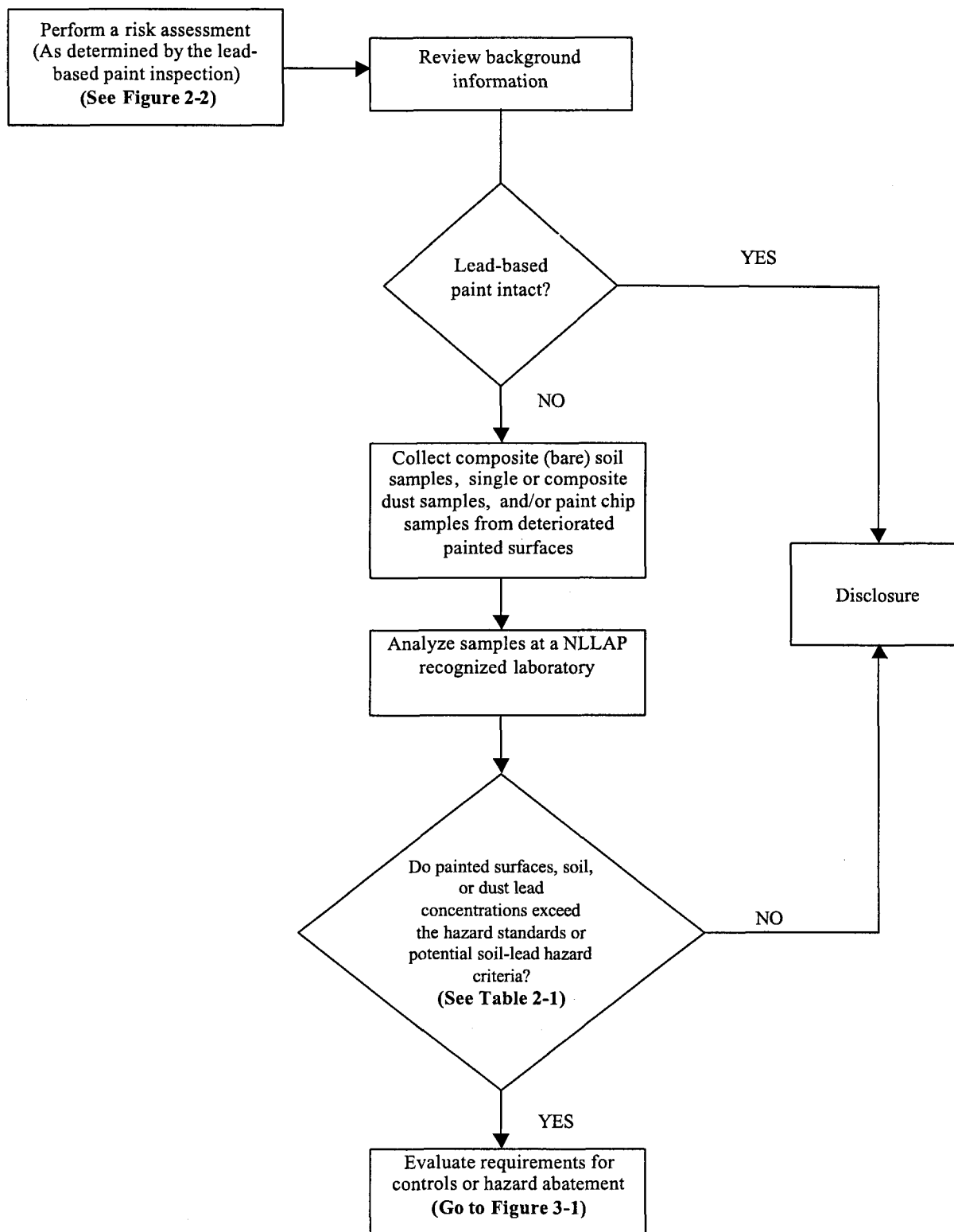


Figure 2-3. The Risk Assessment Process

## LEAD-BASED PAINT HAZARD CRITERIA

Lead-based paint hazard criteria, as defined by 24 CFR 35, Subpart R and DoD policy, for all three sources; painted surfaces (including accessible, friction, and impact surfaces), dusts, and soils, as they apply to target housing and child-occupied facilities, are summarized in the following paragraphs and Table 2-1.

**Deteriorated Painted Surfaces.** Painted surfaces must meet two conditions to be considered lead-based paint hazards: the paint film must contain lead-based paint and the surface must be deteriorated. Intact surfaces containing lead-based paint are not considered lead-based paint hazards and thus do not require abatement. Lead-based painted surfaces with deteriorated paint, regardless of the extent of the deterioration, must be abated.

**Chewable (Accessible), Friction, and Impact Surfaces.** Accessible, friction, and impact surfaces are a special class of painted surfaces with slightly different hazard assessment criteria. *A friction surface is an interior or exterior surface that is subject to abrasion or friction, including certain window, floor, and stair surfaces. An impact surface is an interior or exterior surface that is subject to damage by repeated impacts from related building components, for example, certain parts of doorframes. A chewable or accessible surface is an interior or exterior surface painted with lead-based paint that is accessible to a young child to mouth or chew.* Friction surfaces are considered a lead-based paint hazard if all of the following three criteria are satisfied: the surface contains lead-based paint, there is a dust lead hazard present on the nearest horizontal surface underneath the friction surface, and the surface is abraded. An impact surface is a lead-based paint hazard if there is lead-based paint present, paint on the impact surface is deteriorated or damaged, and the damaged paint is caused by impact with a related building component. Lead-based paint hazards identified on friction or impact surfaces must be abated. An accessible surface is a lead-based paint hazard if the painted surface shows evidence of teeth marks. If an accessible surface is a lead-based paint hazard, only the component bearing that surface should be abated. If no teeth marks are evident, the surface is considered to be intact and is not a lead-based paint hazard.

**Dusts.** Lead-based paint hazard criteria for dusts or dust-lead hazards are defined for carpeted and uncarpeted floors and interior window sills on the basis of either single surface or composite dust samples. If the floor and window sill composite or single surface dust wipe sample concentrations from any given room or common area exceeds 40  $\mu\text{g}/\text{ft}^2$  on uncarpeted and carpeted floors or 250  $\mu\text{g}/\text{ft}^2$  on interior window sills, dusts in that room or common area represent a lead-based paint hazard, and the source of the dust should be identified and controlled.

### Soils.

- **Soil Lead Hazard.** A soil-lead hazard is a concentration of lead in soil greater than or equal to 400 ppm in bare soils in children's play areas, or greater than or equal to 2000ppm in bare soil areas greater than 9 square feet based on a yardwide arithmetic mean of composite samples. Note: Hazard criteria for children's play areas are not applicable to either metal structures, described on page 2, or dwelling units that will be demolished following transfer and redeveloped for residential use.

- Potential Soil-Lead Hazard: DoD defines a potential soil-lead hazard as concentrations of lead in bare soil areas greater than 9 square feet surrounding a dwelling unit that are greater than or equal to 400 ppm and less than 2000ppm. As a matter of policy, services may undertake measures to address potential soil lead hazards such as abatement or interim controls, or determine that no action is appropriate based on the lead-based paint inspection and risk assessment. In evaluating each of these alternatives the risk assessor should consider the relative proximity of children's play areas, the potential for dust generation and the areal extent of bare soil available for exposure, state and local requirements, as well as the feasibility of any potential control options. Note: Potential soil-lead hazards do not include children's play areas and are not defined for metal structures.

Table 2-1. Lead-Based Paint Hazard Recognition

Type of Painted Surface/Media	Lead-Based Paint Hazard Criteria
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Painted Surfaces	Lead-based paint is present on the painted surface <i>and</i> the painted surface is deteriorated.
Friction Surfaces	Lead-based paint is present on the friction surface, <i>and</i> lead-dust levels on the nearest horizontal surface underneath the friction surface exceed the dust-lead hazard standards, <i>and</i> the painted surface shows evidence of abrasion.
Impact Surfaces	Lead-based paint is present on the impact surface, <i>and</i> paint on the impact surface is damaged or otherwise deteriorated, <i>and</i> the damaged paint is caused by impact of a related building component.
Accessible Surfaces (Chewable Surfaces)	Lead-based paint is present on the accessible surface <i>and</i> the surface shows evidence of teeth marks.

Dust	<ul style="list-style-type: none"> <li>≥ 40 ug/ft<sup>2</sup> on carpeted and uncarpeted interior floors</li> <li>≥ 250 ug/ft<sup>2</sup> on interior window sills</li> </ul>
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	Potential Soil-Lead Hazard	Soil-Lead Hazard
Soil	Concentrations of lead in bare soil between 400 and 2000ppm (excluding children's play areas). Alternatives to address potential soil lead hazards include interim controls, abatement, or no action, with selection dependent on the presence and likelihood of exposure by children.	<ul style="list-style-type: none"> <li>≥ 400 ppm bare soils in children's play areas</li> <li>≥ 2000 ppm bare soils all other areas</li> </ul>

## Chapter 3:

### Lead-Based Paint Control and Hazard Abatement Measures

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Title X requirements for control or abatement of lead-based paint hazards differ depending on the age of the housing. 24 CFR 35, Subpart C requires abatement of lead-based paint hazards identified in target housing constructed before 1960. For target housing constructed between 1960 and 1977, the regulation requires that the presence of any known lead-based paint and/or lead-based paint hazards be disclosed to the transferee of the property, but does not require abatement or control of lead-based paint and/or lead-based hazards. The abatement must be conducted no later than 12 months after the risk assessment is completed and may be implemented prior to disposition of the property or may be made a condition of the property transfer. Interim controls may not be used to address lead-based paint hazards required to be abated under 24 CFR 35, Subpart C and are regarded an optional treatment used at the discretion of federal agencies for lead-based paint hazards identified in target housing constructed between 1960 and 1978 or conditions representing less than a lead-based paint hazard.

As a matter of policy, DoD also requires that lead-based paint hazards be abated in child-occupied facilities, soil-lead hazards surrounding housing constructed between 1960 and 1978, and soil-lead hazards remaining after target housing has been demolished and redeveloped for residential use. The abatement must be conducted within 12 months after completion of the risk assessment, and DoD prefers that abatement be made a condition of transfer, in which case the services must ensure that the transferee carries out the abatement prior to occupancy or sale. DoD policy also allows for either interim controls, no action, or abatement to be used to address potential soil-lead hazards (concentrations of lead in bare soil between 400 and 2000 ppm (excluding children's play areas)), depending on the presence and likelihood of exposure to children. Situations in which the various control or hazard abatement measures apply, as determined by the regulations and DoD policy, are described in Table 3-1.

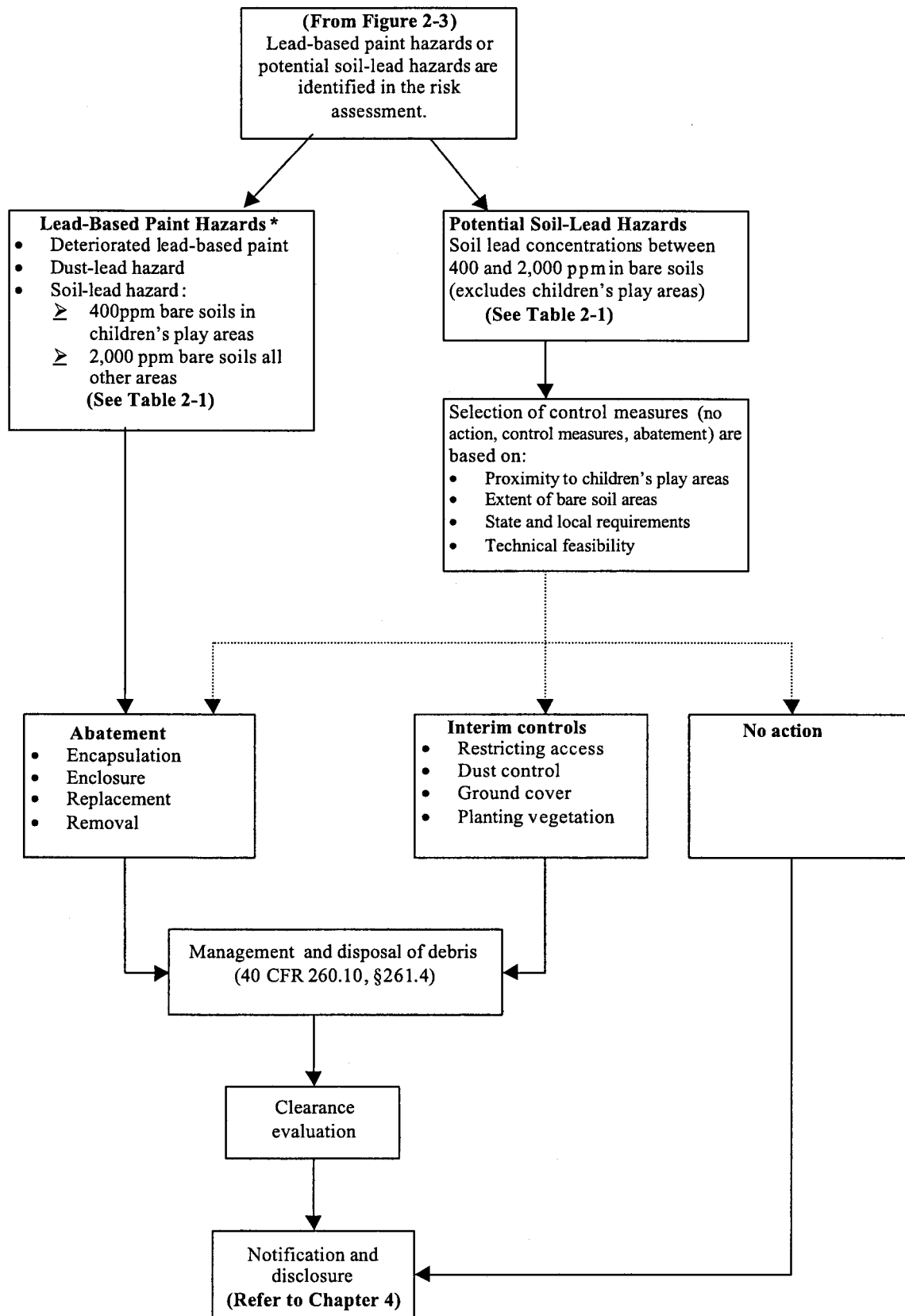
After lead-based paint control and hazard abatement measures have been completed, affected structures must undergo a **clearance examination** to ensure that all abatement activities have been conducted properly. Clearance examinations will usually be performed by the transferee since most control and hazard abatement activities will be carried out following transfer. In such cases, requirements for control, abatement, and clearance activities must be included in the contract for sale or transfer agreement.

In many cases, there are specific state and local regulations that must be considered in the design and implementation of any lead-based paint abatement or control activity. It is important to consult with state and local agencies before initiating any control or abatement actions. Figure 3-1 generally describes the lead-based paint control and hazard abatement process.

**Table 3-1. Situations Applicable to Lead-Based Paint Control and Hazard Abatement Measures**

Control and Hazard Abatement Measures	Potentially Applicable Situations
No Further Action (no hazards)	<ul style="list-style-type: none"> <li>◆ Lead-based paint is not present.</li> <li>◆ Property is not target housing or intended to be reused as a child-occupied facility*.</li> <li>◆ No lead-based paint hazards or potential soil-lead-hazards are present.</li> </ul>
Control Measures (potential soil-lead hazards)	<p>In some circumstances, soil lead concentrations in bare soils between 400 and 2,000 ppm (excluding children's play areas) may be addressed through control measures. This is established by the risk assessment based on proximity to children's play areas, extent of bare soils, state and local requirements, and technical feasibility of any control actions.</p>
Abatement (lead-based paint hazards)	<ul style="list-style-type: none"> <li>◆ Certain lead hazards that are required by federal, state, or local legislation to be permanently abated.</li> <li>◆ Control measures (Interim Controls) were found to be ineffective.</li> <li>◆ Paint on interior or exterior walls or major components are deteriorated.</li> <li>◆ Accessible surfaces show evidence of teeth marks.</li> <li>◆ Friction surfaces are abraded or deteriorated, dust-lead hazard is present, and lead-based paint is present.</li> <li>◆ Impact surfaces are damaged or deteriorated, damage is caused by a related building component, and lead-based paint is present.</li> <li>◆ Soil lead concentration = 400 ppm in bare soils in children's play areas.</li> <li>◆ Soil lead concentration = 2,000 ppm in bare soil areas exceeding 9ft<sup>2</sup>.</li> </ul>

**\*Note:** Target housing that will be demolished and reused for residential use after transfer will require the evaluation and control of soil-lead hazards.



**Figure 3-1. Control and Hazard Abatement Measures**

\*Only soil-lead hazards are required to be abated in target housing constructed between 1960-1978.



## CONTROL MEASURES

Title X defines control measures [*interim controls*] as “a set of measures designed to reduce temporarily human exposure or likely exposure to lead-based paint hazards, including specialized cleaning, repairs, maintenance, painting, temporary containment, ongoing monitoring of lead-based paint hazards or potential hazards, and the establishment and operation of management and resident education programs.”

Control measures can be used to reduce or temporarily eliminate the potential for children to develop adverse health effects from exposure to potential soil-lead hazards. As discussed on page 17 and Table 3-1, control measures can be appropriate for bare soils with an average soil lead concentration between 400 and 2,000 ppm, not observed to be used as a children’s play area. Risk factors to consider in selecting control measures would be the proximity and the extent of bare soils available for exposure by children in nearby play areas. Non-risk factors include promulgated state and local requirements, as well as the technical feasibility of implementing any control measures. Soil that is adequately covered with vegetation, paving, or other landscape material should not generally require either control or abatement actions. State and local authorities should be contacted to identify additional requirements that should be considered for control measures.

Control measures for potential soil-lead hazards can include planting grass or ground cover, mulch, or restricting access, and should be selected on the basis of both risk and non-risk factors. Types of control measures are listed in Box 3-1. The basic elements of control measures include planning, implementation of controls, cleanup, clearance, and any ongoing maintenance and monitoring required to be performed by the transferee. The lead-based paint hazard control plan, prepared by the risk assessor, should identify any feasible control options that may be implemented to address potential soil-lead hazards (HUD Guidelines, Chapter 11, <http://www.hud.gov/lea/leach11.pdf>).

### Box 3-1: Soil-Lead Hazard Control Measures (EPA and HUD Guidelines)

- Planting ground cover or shrubbery to reduce exposure to bare soil
- Covering bare soil with mulch or vegetation
- Removing and controlling dust
- Restricting access through posting, fencing, or other actions

## ABATEMENT

*Title X defines **abatement** as any set of measures designed to permanently eliminate lead-based paint hazards.* EPA and HUD consider permanent measures as those that last at least 20 years. Under this definition, abatement includes removal of lead-based paint and dust-lead hazards, enclosure or encapsulation of lead-based paint, replacement of lead-painted components or fixtures, removal or permanently covering of lead-contaminated soil, and all preparation, cleanup, disposal, and post-abatement clearance testing activities associated with such measures.

Abatement does not include renovation, remodeling, landscaping, or other activities when such activities are not designed to permanently eliminate lead-based paint hazards but instead are designed to repair, restore, or remodel a given structure or dwelling (40 CFR 745.223). Even though these activities may incidentally result in the reduction or elimination of lead-based paint hazards, they are not considered abatement. Abatement also does not include control measures, operation and maintenance activities, and other measures designed to temporarily reduce lead-based paint hazards.

Chapter 12 of the HUD Guidelines describes the general principles of abatement such as building component replacement, enclosure systems, paint removal, and soil abatement (<http://www.hud.gov/lea/leach12.pdf>). Encapsulation is discussed in Chapter 13 of the HUD Guidelines (<http://www.hud.gov/lea/leach13.pdf>). Some commonly used abatement strategies are listed in Box 3-2.

Prohibited lead-based paint abatement methods (40 CFR 745.227(e)(6)) include:

- Open flame burning or torching of lead-based paint.
- Machine sanding or grinding or abrasive blasting or sandblasting without High-Efficiency Particulate Air (HEPA) exhaust control
- Dry scraping (except in conjunction with heat guns or within 1.0 foot of electrical outlets or when treating defective paint spots totaling no more than 2 square feet in any one interior room or 20 square feet on exterior surfaces).
- Operating a heat gun at temperatures above 1,100 degrees Fahrenheit.

24 CFR 35, Subpart C requires that abatement be conducted within 12 months of completion of the risk assessment. All abatement contractors and firms must be certified to perform abatement work, and all abatement workers must be trained and certified, in accordance with 40 CFR Part 745, Subpart L. Abatement activities are required to be recorded, and any monitoring or maintenance activities must be documented and disclosed to the purchaser of the housing. In addition, the location of enclosed or encapsulated lead-based paint may be required to be filed with the appropriate municipal agency for future reference when construction permits for renovation are issued.

**Box 3-2: Abatement Strategies for Lead-Based Paint Hazards**

- Removal of lead-based paint
- Enclosure of lead-based paint
- Encapsulation of lead-based paint
- Replacement of building components that have lead-based paint
- Removal of lead-contaminated dust hazards
- Removal or covering of bare soil areas greater than 9 square feet with lead concentrations greater than or equal to 2,000 ppm or bare soils in children's play areas with lead concentrations greater than or equal to 400 ppm, with a durable cover such as pavement or concrete (not grass or sod)

**DISPOSAL**

Building debris and wastes from lead-based paint abatement activities may result in the generation of hazardous wastes. Transferees conducting these activities will be responsible for complying with all applicable disposal requirements. Transferees, Federal facilities (if applicable), and the contractors involved in abatement or control actions may be considered waste generators and must comply with the existing regulations outlined in RCRA, Subtitles C and D. Facilities should also identify any state and local regulations applicable to the treatment, storage, and disposal of lead-based paint abatement wastes.

Currently, RCRA requires that wastes from abatement and control activities be tested to determine whether the material is a characteristic waste requiring special handling and disposal requirements as a hazardous waste. If the individual or entity responsible for abatement (generator) produces more than 100 kg of hazardous waste per month, the generator must comply with the RCRA hazardous waste regulations. Hazardous wastes staged on site during abatement activities may be stored either until abatement work is completed or until sufficient waste has been collected to constitute a load or shipment; however, storage (particularly storage over 90 days for which a storage permit is required) and disposal must be managed in accordance with RCRA regulations.

If hazardous waste from a single generator is produced in small quantities (less than 100 kg of hazardous waste per month), it could be excluded as "conditionally exempt" through a small-quantity-generator exemption under 40 CFR §261.4. Nonhazardous or exempt wastes may be managed as solid waste with disposal in a state-licensed or state-permitted solid waste facility. HUD has specific recommendations (HUD Guidelines, Chapter 10, "Hazardous and Nonhazardous Waste") for transport of nonhazardous architectural components. These include wrapping and sealing components in plastic during transport and securing waste containers. Exempted wastes should not be burned in a municipal solid waste incinerator, recycled to produce mulch, or reused unless all lead-based paint has been removed.

## **Chapter 4:**

### **Property Transfer Process**

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Title X has specific provisions for lead-based paint in federally owned target housing that is transferred. The federal agency may conduct the required control or abatement measures prior to transfer or the responsibility may be assumed by the transferee. In either case, any abatement or control measures required must be conducted no later than 12 months after the completion of the risk assessment. DoD prefers that in most cases responsibility for control or abatement be transferred to the purchaser, in which case the service must ensure that abatement is conducted in accordance with Title X (through contract clauses or self-certification by the transferee). Occupancy by the transferee is prohibited until all lead-based paint hazards are abated.

Responsibility for any long-term monitoring, periodic inspection, and reevaluation of the control measures and abatement required to be performed after transfer should be made a condition of sale.

Documentation requirements associated with each of these options include:

- Disclosing known lead-based paint and/or lead-based paint hazards
- Incorporating the results of the paint inspection and risk assessment into the Environmental Baseline Survey (EBS).
- Referencing disclosure and evaluation results in the Findings of Suitability to Transfer (FOSTs) and the deed or contract for sale.

#### **DISCLOSURE**

Several disclosure requirements must be satisfied before a property containing lead-based paint or lead-based paint hazards can be transferred. The services must provide the purchaser/transferee with a lead hazard information pamphlet approved by EPA for this purpose. The EPA-approved pamphlet currently is "Protect Your Family from Lead in Your Home" (EPA 747-K-94-001). In addition, the services must disclose to the transferee the presence of any known lead-based paint and/or lead-based paint hazards and provide any available lead hazard evaluation reports. Transferees then have 10 days to conduct a risk assessment or an inspection to identify the presence of lead-based paint and/or lead-based paint hazards, before becoming obligated under the contract. If both parties concur, the requirement may be shortened, extended, or waived. The following information must be provided in an attachment to the contract for sale/transfer agreement (40 CFR §745.113 and 24 CFR § 35.13):

- A "Lead Warning Statement" describing the possibility that the property may present a risk of childhood lead poisoning (Title X specifies the exact wording of this statement).
- A statement signed by the transferee that the transferee has read and understood the lead hazard information pamphlet and acknowledges that he or she had a 10-day opportunity before transfer to conduct a risk assessment or a paint inspection.

- A list of any records or reports available to the services pertaining to lead-based paint and/or lead-based paint hazards in the housing that have been provided to the transferee. If no such records or reports are available the service will indicate this in the attachment to the contract for sale/transfer agreement.
- A statement by transferee acknowledging the receipt of available reports and records.
- A statement by the transferee that he or she has had an opportunity to conduct a risk assessment or inspection or waived the opportunity.
- The signatures of the service representative and the transferee certifying the accuracy of their statements, to the best of their knowledge, along with the dates of the signatures.

For transfers carried out by property transfer agents, such as GSA, 24 CFR 35, Subpart A requires services to disclose to the agent the presence of any known lead-based paint and/or lead-based paint hazards in the target housing being transferred and the existence of any available records or reports pertaining to lead-based paint and/or lead-based paint hazards. In the attachment to the contract or transfer agreement, services are also required to include a statement that the agent has informed the services of their obligations under 42 U.S.C. 4852d, that the agent is aware of his/her duty to ensure compliance with the requirements of 24 CFR 35, Subpart A, and the signatures of the service representative, agents, and the transferee certifying the accuracy of their statements.

Additional information on disclosure requirements, including an EPA lead hazard information pamphlet, can be obtained from the National Lead Information Center (1-800-424-LEAD), from the EPA Lead Programs Internet home page at [www.epa.gov/opptintr/lead/index.html](http://www.epa.gov/opptintr/lead/index.html), or the HUD Office of Hazard Control home page at <http://www.hud.gov/lea>.

## **OTHER DOCUMENTATION REQUIREMENTS**

Reports of lead-based paint inspections and risk assessments prepared for the services by the certified inspectors and risk assessors should be incorporated into the facility Environmental Baseline Survey (EBS).<sup>5</sup> These sections of the EBS shall be referenced in the transfer agreement and referred to in the Invitation for Bids issued for public sale of the property. The control action and abatement reports, which identify components that have been abated and/or treated and the clearance results, shall be included with the transfer documents as part of the disclosure records. The location of enclosed or encapsulated lead-based paint may be required to be filed with the appropriate municipal agency for future reference when construction permits for renovation are issued.

The FOST developed by the services should reference the EBS report and the disclosure information for the property. The transfer agreement or contract for sale should include disclosure statements and the agreements by which the transferee shall conduct any improvements or abatement of lead-based paint hazards, as well as any monitoring, periodic inspections, and other activities required for compliance with Title X for occupancy and future transfer of the property.

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<sup>5</sup> An EBS documents the environmental condition of real and excess DoD property available for transfer to the community.

**Box 4-1: Service Disclosure Requirements****Purchaser/transferee:**

- Disclose known lead-based paint and/or lead-based paint hazards
- Provide any lead-based paint inspection and risk assessment reports
- Provide transferee a lead hazard information pamphlet
- Allow 10 days for purchaser to conduct an assessment or inspection for the presence of lead-based paint and/or lead-based paint hazards
- Attach the following to the contract:
  - “lead warning statement”.
  - a statement disclosing the presence of known lead-based paint and/or lead-based paint hazards
  - a list of records or reports that have been provided to the transferee
  - a statement by the transferee affirming receipt of the information and reports in the property deed
  - a statement by the transferee that he/she has received an opportunity to conduct an inspection or risk assessment
  - the signatures of DoD and the transferee attesting to the accuracy of their statements.

**Property transfer agents:**

- Disclose known lead-based paint and/or lead-based paint hazards
- Existence of available records or reports
- Attach the following to the contract:
  - A statement that the agent has informed DoD of DoD’s obligations under 42 U.S.C. 4852d
  - The agent is aware of his/her duty to ensure compliance with the requirements of 24 CFR 35, Subpart A
  - The signatures of DoD, agents, and the transferee certifying the accuracy of their statements

## **Appendices**

## Appendix A

### Glossary

Unless otherwise specified, definitions in this appendix are derived from Title X, the Residential Lead-Based Paint Hazard Reduction Act.

**Abatement:** Any set of measures designed to permanently eliminate lead-based paint hazards in accordance with standards established by appropriate federal agencies. Such measures may include (1) removal of lead-based paint and lead-contaminated dust, permanent enclosure or encapsulation of lead-based paint, replacement of lead-based painted components or fixtures, and/or removal or covering of lead-contaminated soil and (2) all preparation, cleanup, disposal, and post-abatement clearance testing activities associated with such measures.

**Accessible (chewable) surface:** An interior or exterior surface painted with lead-based paint that is accessible to a young child to mouth or chew. A chewable surface is the same as an "accessible surface" as defined in 42 U.S.C. 4851b(2). Hard metal substrates and other materials that cannot be dented by the bite of a young child are not considered chewable.

**Agent:** An agent is any party who enters into a contract with a seller or lessor, including any party who enters into a contract with a representative of the seller or lessor, for the purpose of selling or leasing target housing. This term does not apply to purchasers or any purchaser's representative who receives all compensation from the purchaser.

**Arithmetic mean:** The algebraic sum of data values divided by the number of data values (e.g., the sum of the concentration of lead in several soil samples divided by the number of samples. For soils, the arithmetic mean is the average of the composite samples. The composite concentrations are summed and divided by the number of composite samples included in the average. To evaluate soil-lead hazards composite samples from the midyard and dripline are used to derive an arithmetic mean of the yardwide average lead concentration.

**Bare soil:** Soil not covered by grass, sod, or other live ground covers, or by wood chips, gravel, artificial turf, or similar covering. Bare soil includes sand.

**Certified:** Licensed or certified to perform such activities as risk assessment, lead-based paint inspection, or abatement supervision, by either EPA or a State or Indian tribe with a lead-based paint certification program authorized by the Environmental Protection Agency (EPA), in accordance with 40 CFR 745.226.

**Clearance examination:** An activity conducted following lead-based paint hazard reduction activities to determine that the hazard reduction activities are complete and that no soil-lead hazards or settled dust-lead hazards exist in the dwelling unit or worksite. The clearance process includes a visual assessment and collection and analysis of environmental samples.



**Child-occupied facility:** A building, or portion of a building, constructed prior to 1978, visited regularly by the same child, less than 6 years of age, on at least two different days within any week (Sunday through Saturday), provided that each day's visit lasts at least 3 hours, that the combined weekly visits last at least 6 hours, and that the combined annual visits last at least 60 hours. Child-occupied facilities may include, but are not limited to, day-care centers, pre-schools, and kindergarten classrooms (40 CFR Part 745.223).

**Common Areas:** A portion of a building that is generally accessible to all occupants. Such an area may include, but is not limited to, hallways, stairways, laundry and recreational rooms, playgrounds, community centers, garages, and boundary fences.

**Component:** An element of a dwelling unit or common area identified by type and location. Examples include, but are not limited to, a bedroom wall, an exterior window sill, a baseboard in a living room, a kitchen floor, an interior window sill in a bathroom, a porch floor, stair treads in a common stairwell, or an exterior wall.

**Composite sample:** A collection of more than two subsamples of the same medium (e.g., dust, soil, or paint) from the same type of surface (e.g., floor, window sill, or window trough), not to exceed 10 subsamples, such that multiple samples can be analyzed as a single sample.

**Control Measures** [Interim controls]: A set of measures designed to reduce temporarily human exposure or the likelihood of exposure to lead-based paint hazards, including specialized cleaning, repairs, maintenance, painting, temporary containment, ongoing monitoring of lead-based paint hazards or potential soil lead hazards, and the establishment and operation of management and resident education programs.

**Deteriorated paint:** Any interior or exterior paint or other coating that is peeling, chipping, chalking, or cracking or any paint or coating located on an interior or exterior surface or fixture that is otherwise damaged or separated from the substrate.

**Dust-lead hazard:** Depending on the evaluation method used, a dust-lead hazard is surface dust that contains dust-lead loading at or exceeding the following:

Evaluation Method	Surface (ug/ft <sup>2</sup> )		
	Floors	Interior window sills	Window troughs
Lead hazard screen	25	125	N/A
Risk Assessment	40	250	N/A
Reevaluation	40	250	N/A
Clearance	40	250	800

Note: Floors include carpeted and uncarpeted interior floors.

***Dwelling unit:*** A single-family dwelling, including attached structures such as porches and stoops; or a housing unit in a structure that contains more than one separate housing units, and in which each such unit is used or occupied, or intended to be used or occupied, in whole or in part, as the home or separate living quarters of one or more persons.

***Evaluation:*** A risk assessment, a lead hazard screen, a lead-based paint inspection, paint testing, or a combination of these to determine the presence of lead-based paint hazards or lead-based paint.

***Expected to reside:*** There is actual knowledge that a child will reside in a dwelling unit reserved for the elderly or designated exclusively for persons with disabilities. If a resident is a woman known to be pregnant, there is actual knowledge that a child will reside in the dwelling unit.

***Federally owned housing:*** Residential dwellings owned or managed by a federal agency, or for which a federal agency is a trustee or conservator.

***Friction surface:*** An interior or exterior surface that is subject to damage by abrasion or friction, including, but not limited to, certain window, floor, and stair surfaces.

***Impact surface:*** An interior or exterior surface that is subject to damage by repeated sudden force, such as certain parts of door frames.

***Inspection:*** see [Paint] Inspection

***Interim controls*** [Control Measures]: A set of measures designed to reduce temporarily human exposure or the likelihood of exposure to lead-based paint hazards, including specialized cleaning, repairs, maintenance, painting, temporary containment, ongoing monitoring of lead-based paint hazards or potential soil lead hazards, and the establishment and operation of management and resident education programs.

***Lead-based paint:*** Paint or other surface coatings that contains lead in excess of 1.0 mg/cm<sup>2</sup> of lead or more than 0.5 percent lead by weight.

***Lead-based paint evaluation:*** A risk assessment, a lead hazard screen, a lead-based paint inspection, paint testing, or a combination of these to determine the presence of lead-based paint hazards or lead-based paint. (See Evaluation).

***Lead-based paint hazard:*** Any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, or lead-contaminated paint that is deteriorated or is present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects, as established by the appropriate federal agency.

***Lead hazard screen:*** A limited risk assessment activity that involves paint testing and dust sampling as described in 40 CFR 745.227(c).

**Multi-family property:** Residential real property containing five or more dwelling units.

**[Lead-based paint] Inspection:** A surface-by-surface investigation to determine the presence of lead-based paint and the provision of a report explaining the results of the investigation.

**Play area:** An area of frequent soil contact by children of less than 6 years of age, as indicated by the presence of play equipment (e.g. sandboxes, swing sets, sliding boards, etc.) or toys or other children's possessions, observations of play patterns, or information provided by parents, residents, residents or property owners.

**Random sampling:** Samples collected from dwelling units and common areas selected at random from a multi-dwelling project, used to represent sample results for all dwelling units and common areas.

**Reduction:** Measures designed to reduce or eliminate human exposure to lead-based paint hazards through methods including interim controls and abatement.

**Residential dwelling:** (1) A single-family dwelling, including attached structures such as porches and stoops, or (2) a single-family dwelling unit in a structure that contains more than one separate residential dwelling unit and in which each such unit is used or occupied, or intended to be used or occupied, in whole or in part, as the home or residence of one or more persons.

**Residential real property:** Real property on which there is situated one or more residential dwellings used or occupied, or intended to be used or occupied, in whole or in part, as the home or residence of one or more persons. For the purposes of this guide, child-occupied facilities are included in this definition.

**Risk assessment:** An on-site investigation to determine and report the existence, nature, severity, and location of lead-based paint hazards in residential dwellings, including (1) information gathered regarding the age and history of the housing and occupancy by children under age 6; (2) visual inspection; (3) limited wipe sampling or other environmental sampling techniques; (4) other activity as may be appropriate; and (5) provision of a report explaining the results of the investigation.

**Single room occupancy:** Housing consisting of zero-bedroom dwelling units that may contain food preparation or sanitary facilities or both (see Zero-bedroom dwelling).

**Soil-lead hazard:** Bare soil on residential real property that contains lead from lead-based paint equal to or exceeding 400 ppm in children's play areas, or equal to or exceeding 2000ppm in other areas with bare soils that total more than 9 square feet per residential property.

**Target housing:** Any housing constructed before 1978, except housing designated exclusively for the elderly or persons with disabilities (unless a child younger than 6 years of age also resides, or is expected to reside, in such housing) and except any zero-bedroom dwelling.

***Targeted sampling:*** Sampling that selects dwellings that are most likely to contain lead-based paint hazards to represent the other dwellings in a project or property based on information supplied by the owner (HUD Guidelines, Chapter 5).

***Worst-case sampling:*** Sampling requiring a walk-through survey of all dwellings by the risk assessor in order to select the highest-risk dwellings based on direct visual evidence (HUD Guidelines, Chapter 5).

***Zero-bedroom dwelling:*** Any residential dwelling in which the living areas are not separated from the sleeping area. The term includes efficiencies, studio apartments, dormitory or single room occupancy housing, military barracks, and rentals of individual rooms in residential dwellings (see Single room occupancy (SRO)).

## **Appendix B**

### **References**

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Requirements for Hazard Education Before Renovation of Target Housing. 40 CFR Part 745, Subpart E.

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## Appendix C

### Lead Based Paint Standards and Test Methods

#### *ASTM Standards*

##### Sampling and Analysis

#### 1. Dust

- ◆ **E 1728**, Standard Practice for Field Collection of Settled Dust Samples Using Wipe Sampling Methods for Lead Determination by Atomic Spectrometry Techniques.
- ◆ **E 1973**, Provisional Standard Practice for the Collection of Surface Dust by Air Sampling Pump Vacuum Technique for Subsequent Lead Determination.
- ◆ **E 1792**, Standard Specification for Wipe Sampling Materials for Lead in Surface Dust.
- ◆ **E 1644**, Standard Practice for Hot Plate Digestion of Dust Wipe Samples for the Determination of Lead by Atomic Spectrometry.
- ◆ **PS 88**, The Determination of Lead in Paint, Settled Dust, Soil and Air Particulate by Field-Portable Electroanalysis.
- ◆ **E 1741**, Standard Practice for Preparation of Airborne Particulate Lead Samples Collected During Abatement and Construction Activities for Subsequent Analysis by Atomic Spectrometry.

#### 2. Soil

- ◆ **E 1727**, Standard Practice for Field Collection of Soil Samples for Lead Determination by Atomic Spectrometry Techniques.
- ◆ **E 1726**, Standard Practice for Sample Digestion of Soils for the Determination of Lead by Atomic Spectrometry.
- ◆ **PS 88**, The Determination of Lead in Paint, Settled Dust, Soil and Air Particulate by Field-Portable Electroanalysis.

#### 3. Paint

- ◆ **E 1729**, Standard Practice for Field Collection of Dried Paint Samples for Lead Determination by Atomic Spectrometry Techniques.
- ◆ **E 1645**, Standard Practice for the Preparation of Dried Paint Samples for Subsequent Lead Analysis by Atomic Spectrometry.

- ◆ **E 1753**, Use of Qualitative Chemical Spot Test Kits for Detection of Lead in Dry Paint Films.
- ◆ **PS 88**, The Determination of Lead in Paint, Settled Dust, Soil and Air Particulate by Field-Portable Electroanalysis.
- ◆ **PS 95**, Provisional practice for quality systems for conducting in situ measurements of lead content in paint or other coatings using field-portable x-ray fluorescence XRF devices.
- ◆ **E 1775**, Standard Guide for Evaluating Performance of On-Site Extraction and Field-Portable Electrochemical for Spectrophotometric Analysis of Lead.
- ◆ **E 1613**, Standard Test Method for Analysis of Digested Samples for Lead by Inductively Coupled Plasma Atomic Emission Spectrometry (ICP-AES), Flame Atomic Absorption (FAAS), or Graphite Furnace Atomic Absorption (GFAAS) Techniques.
- ◆ **E 1828**, Evaluating the Performance Characteristics of Qualitative Chemical Spot Test Kits for Lead in Paint.

#### Lead-Based Paint Management and Abatement

##### 1. Management

- ◆ **E 1864**, Practice for Evaluating Quality Systems of Organizations Engaged in Conducting Facility and Hazard Assessments to Determine the Presence and Extent of Lead in Paint, Dust, Airborne Particulate, and Soil.
- ◆ **E 1908**, Standard Guide for Sample Selection of Debris Waste from a Building Renovation or Lead Abatement Project for Toxicity Characteristic Leaching Procedure (TCLP) Testing for Leachable Lead.
- ◆ **E 1605**, Standard Terminology Relating to Abatement of Hazards from Lead-Based Paint in Buildings and Related Structures.
- ◆ **PS 53**, Provisional Standard Guide for Identification and Management of Lead Hazards in Facilities.

##### 2. Abatement

- ◆ **E 1795**, Standard Specification for Non-Reinforced Liquid Coating Encapsulation Products for Leaded Paint in Buildings.
- ◆ **E 1796**, Standard Guide for the Selection and Use of Liquid Coating Encapsulation Products for Leaded Paint in Buildings.



- ◆ **E 1797**, Standard Specification for Reinforced Liquid Coating Encapsulation Products for Leaded Paint in Buildings.

### *Other Applicable Standards*

#### Lead Hazard Sampling Protocols and Strategies

“Residential Sampling for Lead: Protocols for Dust and Soil Sampling,” Environmental Protection Agency, EPA 747-R-95-001, March 1995. (Note: The protocols presented in this document are equivalent to ASTM methods.)

“Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing,” Department of Housing and Urban Development, June 1995, Revised Chapter 7, September 1997.

40 CFR Part 745, “Lead-Based Paint Activities.”

EPA Memorandum, “Guidance on Residential Lead-Based Paint, Lead-Contaminated Dust, and Lead-Contaminated Soil, 11 September 1995, 60 FR 47248.

#### Analysis Methods

U.S. Environmental Protection Agency. “Test Methods for Evaluating Solid Waste Physical/Chemical Methods,” EPA SW 846. Specific methods include:

- ◆ **3050**, Dust Wipe Digestion
- ◆ **7420, 7421, 6010**, Atomic Absorption or Inductively Coupled Plasma Atomic Emission Spectrometry

“National Institute for Occupational Safety and Health Manual of Analytical Methods.” Methods include:

- ◆ **7082**, Atomic Absorption (AA) Flame
- ◆ **7105**, AA Graphite Furnace
- ◆ **7300**, Elements ICP
- ◆ **7701**, Ultrasound/Anodic Stripping Voltammetry
- ◆ **9100**, Lead in Surface Wipe Samples

ID 125G, “Metals and Metalloid Particulates,” OSHA Analytical Methods. (inductively coupled plasma atomic emission spectrometry [ICP-AES] method.)

## **Appendix D**

### **Questions & Answers**

**1. Are a lead-based paint inspection and a risk assessment required for all pre-1978 housing prior to transfer?**

Yes, unless an inspection finds that the property is free of lead-based paint. Title X requires inspection and abatement of lead-based paint hazards in housing constructed prior to 1960, and an inspection for lead-based paint and lead-based paint hazards in target housing constructed between 1960 and 1977. 24 CFR 35, Subpart C clarifies these provisions, requiring a lead-based paint evaluation (an inspection, risk assessment, or combination of thereof) be performed for all pre-1978 target housing prior to transfer. The risk assessment must be performed within 12 months of transfer, and abatement must be conducted within 12 months of completion of the risk assessment.

**2. What is a lead-based paint hazard in regard to friction, impact, or accessible surfaces, and what is required to be abated?**

As stated in section 1013 of Title X, a lead-based paint hazard is “any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, or lead-contaminated paint that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects...” As described in Table 2-1 in this guide, and 24 CFR 35, Subpart R, impact surfaces require treatment (i.e., abatement or interim controls) only if all of the following conditions are met: (1) the surface is damaged or has otherwise deteriorated, (2) the damaged paint is caused by impact from a related building component, (3) the surface contains lead-based paint. Friction surfaces require treatment only if all of the following conditions are met: (1) a dust lead hazard is present on the nearest horizontal surface underneath the friction surface, (2) paint on the surface is abraded or deteriorated, and (3) the surface contains lead-based paint. Accessible surfaces require treatment only if there is evidence that a child has chewed or mouthed that surface.

**3. Is scraping and painting over deteriorated paint with 20-year paint adequate abatement?**

Lead-based paint abatement refers to a group of measures that can be expected to eliminate or reduce exposures to lead-based paint hazards for at least 20 years under normal conditions. If the “20-year paint” meets the qualifications of an encapsulant in Chapter 13 of the HUD Guidelines and it is applied in accordance with manufacturers instructions, it should be an acceptable treatment for deteriorated paint.

**4. What information should be included in the property transfer documents if the target housing is scheduled to be demolished and the property will not be reused for residential redevelopment?**

Lead-based paint evaluation and abatement are not required if the housing is not reused for habitation. However, DoD policy requires the evaluation and abatement of soil-lead hazards in residential real property that will be demolished and redeveloped for residential purposes following transfer. Requirements for evaluation and abatement should be made a condition of the property transfer, in which case the transferee will be required to evaluate and abate any soil-lead hazards after demolition and prior to occupancy of any newly constructed housing units. The transfer agreement should reference Field Guide evaluation requirements and the soil-lead hazard criteria in Table 2-1.

**5. Do we have to abate lead-based paint hazards in target housing prior to transfer? If the responsibility for abatement is transferred to the purchaser, what will the federal agency be required to do to fulfill requirements under Title X?**

Under 24 CFR 35, Subpart C, the federal agency may conduct the required abatement prior to transfer or that responsibility may be assumed by the transferee. The federal agency is required to conduct a lead-based paint inspection and risk assessment prior to transfer, and the risk assessment must be performed no more than 12 months prior to transfer. Abatement must begin no more than 12 months after the completion of the risk assessment. Occupancy by the transferee is prohibited until all lead-based paint hazards are abated. DoD prefers that responsibility for abatement be transferred to the purchaser, in which case the service must ensure that abatement is conducted in accordance with Title X. Assurances that the purchaser will perform required abatement activities are provided through contractual mechanisms.

**6. When are interim controls appropriate and when are they inappropriate?**

Control measures or interim controls may be used as an optional treatment at the discretion of federal agencies to address hazards not required to be abated under 24 CFR 35, Subpart C and conditions representing less than a lead-based paint hazard. Control measures, along with abatement or no action, may be appropriate alternatives to address potential soil lead-based paint hazards (soil lead concentrations in bare soils between 400 and 2,000 ppm (excluding children's play areas) which are not considered to be lead-based paint hazards but are present in amounts or under conditions that may be a potential exposure hazard to children. Selection of alternatives for potential soil lead hazards should be evaluated on the basis of the risk assessment and criteria contained in Chapter 2 of the Field Guide.

**Appendix E**  
**DoD Policy and EPA-DoD Agreements**



THE DEPARTMENT OF DEFENSE  
AND  
THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY



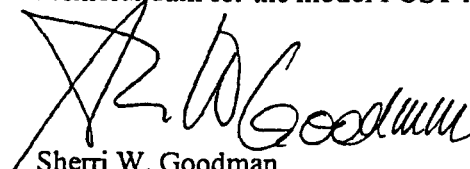
WASHINGTON, DC 17 MAR 1999

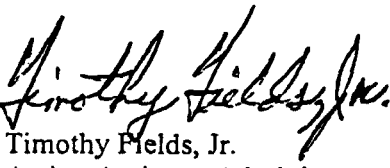
SUBJECT: Management of Lead-Based Paint in Residential and Non-Residential Areas at Base Realignment and Closure (BRAC) Properties

The purpose of this memorandum is to transmit the agreements (attached) EPA and DoD reached on August 14, 1998, and to provide a schedule for completing the actions the agencies agreed to jointly undertake.

**Residential Areas:** EPA and DoD agreed that Title X (of the Housing and Community Development Act of 1992, 42 U.S.C. 4822) procedures provide an efficient, effective, and legally adequate framework for addressing lead-based paint in residential areas and that, as a matter of policy, CERCLA/RCRA will not be applied except in limited circumstances. DoD actions to address the threat of lead poisoning from lead-based paint in residential areas will be conducted in accordance with Title X/TSCA requirements. To assist EPA and DoD personnel to understand and comply with current HUD, EPA, and OSHA regulations on lead-based paint, EPA and DoD are jointly developing a guidance document entitled, *Lead-Based Paint Guidelines for Disposal of Residential Property: A Field Guide*. The target date for completing the Field Guide is May 28, 1999.

**Non-Residential Areas:** EPA will conduct and fund a national pilot study, with DoD coordination, to assess lead-based paint hazards in non-residential areas. The target date EPA and DoD have set for finalizing the pilot study is May 14, 1999. EPA and DoD agreed that sampling efforts on non-residential areas would be limited, pending the results of the pilot study to: 1) certain types of metallic structures (water towers, communications towers, and bridges) where soil-lead from lead-based paint is reasonably expected to exist, or 2) specific areas of the parcel or structure where the known future use is as a child occupied facility. After the results of the pilot study, the types of structures to be sampled will be re-assessed. EPA agreed not to require sampling of all non-residential areas for lead-based paint. EPA and DoD also agreed to develop model language on lead-based paint for the Finding of Suitability to Transfer (FOST) document for non-residential property. This model language will generally describe what has been done regarding lead-based paint hazards and DoD and transferee responsibilities. Final agreement on sampling for lead-based paint in non-residential areas will be included in the cover memorandum for the model FOST language.

  
Sherri W. Goodman  
Deputy Under Secretary of Defense  
(Environmental Security)  
Department of Defense

  
Timothy Fields, Jr.  
Acting Assistant Administrator for the  
Office of Solid Waste and Emergency  
Response  
U.S. Environmental Protection Agency

Attachment

## SUMMARY OF EPA/DoD AUGUST 14<sup>th</sup> MEETING

The Environmental Protection Agency (EPA) and the Department of Defense (DoD) want to ensure that lead in soil from lead-based paint is addressed in a manner that: (1) is protective of human health and the environment, (2) is consistent with nationally applicable regulations and standards, and (3) supports the President's Five Point Plan for Base Realignment and Closure (BRAC) Property Reuse.

EPA and DoD discussed alternatives for addressing lead-based paint in both residential and non-residential areas and the application of Title X (the Residential Lead-Based Paint Hazard Reduction Act) including section 403 of the Toxic Substances Control Act (TSCA), and the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) for assessing lead-based paint hazards. EPA's key concern was whether actions taken under another statutory authority would be sufficient to provide the covenants required under section 120(h)(3) of CERCLA. DoD's key issue was that DoD not be regulated differently, and in this case more stringently, than any other federal agency or private entity.

Resolved for Residential Areas: EPA has concluded that release of lead-based paint to soil is a release of a hazardous substance under CERCLA, but that generally Title X/TSCA 403 is the appropriate regulatory regime for addressing lead-based paint hazards in residential areas in the majority of situations. It was agreed that Title X procedures, provide an efficient, effective, and legally adequate framework for addressing lead-based paint in residential areas and that, as a matter of policy, CERCLA/Resource Conservation and Recovery Act (RCRA) would not be applied except in limited circumstances. DoD stated that, although they are not legally required by Title X to do so, it is willing prospectively, as part of an overall resolution of the lead-based paint issue, to abate 1960-1978 target housing (as defined in Title X) with lead-based paint hazards where a risk is indicated, or to otherwise ensure that such structures will not be used as target housing until such abatement is performed by either DoD or the grantee. DoD and EPA agreed to jointly develop a field guide summarizing the Department of Housing and Urban Development's (HUD) Title X and EPA's TSCA 403 requirements and that the Field Guide will outline the limited circumstances under which CERCLA/RCRA would be used.

If DoD installations comply with jointly developed guidelines, EPA agreed it will review the Finding of Suitability to Transfer (FOST) without adverse comments regarding lead-based paint.

### Resolved for Non-Residential Areas:

EPA will conduct and fund a national pilot program, with DoD coordination, to assess lead-based paint hazards in non-residential areas, provided this pilot also assesses non-DoD sites such as public, private, Superfund, RCRA, and Brownfields sites.

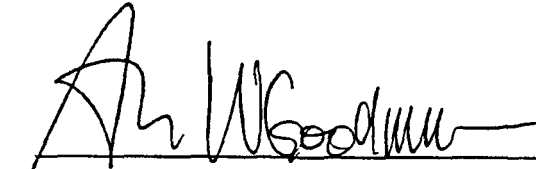
DoD and EPA also agreed to develop model FOST language. This model language will generally describe what has been done regarding lead-based paint hazards and DoD and transferee responsibilities.

Further, EPA and DoD agreed that sampling efforts on non-residential areas would be limited, pending the results of the pilot program, to certain types of structures where high concentrations of lead-based paint are reasonably expected to exist. EPA agreed not to require sampling of all non-residential areas for lead-based paint. DoD agreed to provide EPA with a proposed list of structures for further consideration. Once agreed to, these structures will be assessed under the procedures of CERCLA and DoD's Defense Environmental Restoration Program (DERP). The type of structures DoD has proposed for such sampling are water towers, communication towers, and bridges. EPA believes that sampling or other requirements to be defined in the model FOST or in the Field Guide may be appropriate in the specific area of the parcel or structure where the known future use is as a child occupied facility.

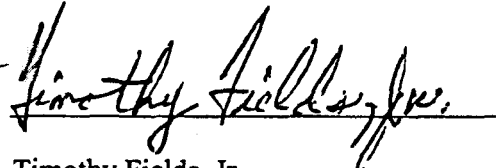
The model FOST language and agreement on specific structures will enable DOD, EPA, and the states to focus resources on areas likely to pose the greatest risk.

Other Agreements Reached:

1. EPA and DoD will work together to communicate strategies on lead-based paint. EPA and DoD jointly developed a press release based on the agreements during the August 14 meeting. The press release was issued on August 21, 1998.
2. EPA will not issue a separate OSWER policy on lead-based paint for CERCLA section 120(h) properties as long as progress is being made, and such a policy will only be issued in consultation with DoD.



Sherri W. Goodman  
Deputy Under Secretary of Defense  
(Environmental Security)  
Department of Defense



Timothy Fields, Jr.  
Acting Assistant Administrator for the  
Office of Solid Waste and Emergency  
Response  
U.S. Environmental Protection Agency,



ACQUISITION AND  
TECHNOLOGY

## OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON  
WASHINGTON DC 20301-3000

JAN. 07 2000

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY  
(INSTALLATIONS, LOGISTICS, AND ENVIRONMENT)  
ASSISTANT SECRETARY OF THE NAVY  
(INSTALLATIONS AND ENVIRONMENT)  
ASSISTANT SECRETARY OF THE AIR FORCE  
(MANPOWER, RESERVE AFFAIRS, INSTALLATIONS  
AND ENVIRONMENT)  
DIRECTOR, DEFENSE LOGISTICS AGENCY

SUBJECT: Lead-Based Paint Policy for Disposal of Residential Real Property

The Department of Defense (DoD) policy is to manage lead-based paint in a manner protective of human health and the environment and to comply with all applicable Federal, State, or local laws regulating lead-based paint and lead-based paint hazards.

The attached Field Guide is a joint DoD and Environmental Protection Agency (EPA) guidance document for use by DoD and EPA personnel in the evaluation and control of lead-based paint at DoD residential real property scheduled for disposition under the base realignment and closure (BRAC) program. Lead-based paint requirements are defined by Title X, the Residential Lead-Based Paint Hazard Reduction Act of 1992, which amended the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. Section 4822) and its implementing regulations (under the EPA Toxic Substances Control Act (TSCA) Section 403 rule and the Department of Housing and Urban Development (HUD) Section 1013 rule). DoD will issue separate policy on lead-based paint requirements for transferring non-residential properties.

The Field Guide provides a general roadmap summarizing the requirements for the evaluation and control of lead-based paint hazards in target housing as defined by Title X and TSCA. In addition to existing Title X requirements, the Field Guide also specifies some actions that exceed Title X requirements. These actions represent DoD's desire to go beyond actions strictly required by law to ensure that activities taken in this regard are protective of human health and the environment. DoD policy is to:

- Abate soil-lead surrounding housing constructed between 1960 and 1978 (Title X requires abatement of lead-based paint hazards in target housing constructed prior to 1960). The transfer agreement may require the purchaser to perform the abatement activities.
- Evaluate the need for interim controls, abatement, or no action for bare soil lead concentrations between 400 and 2000 ppm (excluding children's play areas) based on the findings of the lead-based paint inspection, risk assessment, and criteria contained in the Field Guide.

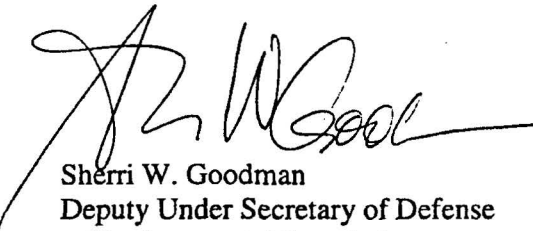




- Evaluate and abate lead-based paint hazards in structures reused as child-occupied facilities located on residential real property. Child-occupied facilities are day care centers, preschools, and kindergarten classrooms visited regularly by children under six years of age.
- Evaluate and abate soil-lead hazards for target housing demolished and redeveloped for residential use following transfer. Under Title X, residential dwellings that are demolished or not intended for occupancy after transfer do not require an inspection and risk assessment or lead-based paint control and hazard abatement. However, DoD requires that the terms of property transfer include a requirement for the transferee to evaluate and abate any soil-lead hazards prior to occupancy of any newly constructed dwelling units.

By adding these additional measures as a matter of policy, DoD believes it exceeds measures necessary to reduce potential lead exposures in children and will significantly contribute to the elimination of adverse effects in children from exposures to lead from lead-based paint in federally-owned target housing subject to disposition.

This lead-based paint policy supersedes the DoD 31 October 1994 lead-based paint policy attached to the PADUSD (ES) memorandum, Asbestos, Lead Paint, and Radon Policies at BRAC Properties. The asbestos and radon policies referenced in the memorandum remain in effect. Property transfer agreements executed under the previous policy are not required to meet these requirements. The effective date implementing these requirements is 30 March 2000.



Sherri W. Goodman  
Deputy Under Secretary of Defense  
(Environmental Security)

Attachment

**Attachment 4**  
**Comments/Responses to Comments**

## **Response to Comments on the Draft FOST**

## Document Title:

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, June 2003

Reviewer: Nicole Moutoux, Project Manager, USEPA, Region 9. Email Dated: June 12, 2003

Comment No.	Section/ Page No.	Comment	Response
GENERAL COMMENTS			
1.		A map showing the contaminated groundwater plumes should be provided with the FOST.	Areas associated with contaminated groundwater plumes are not transferable and therefore have been carved out and are part of the FOSL. The FOST only includes areas that are suitable for transfer. Text will be added in Section 1 (Introduction) to clarify this including reference to groundwater plumes. Figure 6b of the FOSL shows groundwater plumes for IRP sites. Section 1 of both documents includes a recommendation to read the FOST and FOSL in tandem.
2.		<p>It is not reasonable to expect a future user of the FOST to review the EBS at the same time. Therefore, the FOST should be somewhat of a stand-alone document. As such, please include the following details:</p> <ul style="list-style-type: none"> <li>- The map which shows future reuse as well as the carve-out areas should note the environmental condition which caused the carve-out. For example, note that IRP 16 is the reason for one of the carve-outs in the runway area.</li> <li>- LOCs are generally referred to on page 2-2. However the following sections further categorize these LOCs. There should be a short description of these environmental conditions in the FOST as was in the EBS.</li> </ul>	<p>Carve-out information will be added to Attachment 6. Reuse information will not be provided. Please see response to General Comment #4 for DTSC's FOST comments.</p> <p>A description of LOC types will be added to Section 4.</p>
3.		In section 5, Notifications and Restrictions, the following statement is made several times, "The transferee shall not conduct subsurface excavation, drilling, within the vicinity of the following PRLs." The phrase "within the vicinity" is too vague to be sufficiently enforced, and must be defined more clearly and shown on a map.	These PRLs will now be carveouts and will be included in the FOSL and not the FOST. Therefore, no restrictions associated with these PRLs will be included in the FOST.

## Document Title:

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, June 2003

Reviewer: Nicole Mouloux, Project Manager, USEPA, Region 9. Email Dated: June 12, 2003

Comment No.	Section/ Page No.	Comment	Response
4.		Also in Section 5, Notifications and Restrictions, the first paragraph states that notification will be provided to transferee by attaching a copy of the FOST to each deed. Section 120(h)(3)(A) requires that the notice be included in the deed. Attaching the FOST to the deed will be not be sufficient unless the deed references the FOST and the FOST will also be recorded together with the deed.	The statement that a copy of the FOST will be attached to each deed will be deleted. A table including relevant hazardous substances that have been stored, released, or disposed of for each parcel will be attached to each deed instead of the entire FOST.

## SPECIFIC COMMENTS

1.	Page 4-1, §4.1.1	Before transfer of these PRLs the Navy must provide documentation showing that these PRLs were not associated with hazardous substances. Because these PRLs have not been investigated, we cannot be sure that they are only associated with petroleum products. In addition, PRL 380 is not shown on either Figure 4a or 4b.	Appendix E provides the specific information regarding PRL sites. If petroleum products are the only suspected contaminant at a PRL site, it was identified as ECP Type 2a.  PRL 380 is now included in the FOST. Text regarding this site has been removed from the FOST.
2.	Page 4-2, §4.1.3.1	Site 4 is not shown on Figure 6.	IRP Site 4 is within carve-out II-E. Text regarding this site has been removed from the FOST.
3.	Page 4-5, §4.1.3.6	It is not clear which soils the Navy would like to transfer without restrictions. More specifics regarding the depth of the vadose zone must be provided and shown on a map. The description of the depth of the shallow groundwater plume should also be provided and shown on a map.	Site 24 -Vadose Zone is now part of the FOST; accordingly reference to soils without restrictions has been removed.
4.	Page 4-10, §4.2.5.1	This states "Types of hazardous substance LOCs in Parcel V-A include "APHO" sites. This leads the reader to believe that there may be others. Please reconcile.	Text has been added to clarify that APHO and RFA sites are the only hazardous substance LOCs within Parcel V-A.
5.	Page 5-1, §5.1	Note that PRL 380 is not shown on the appropriate figure.	PRL 380 is included in the FOST. Text regarding this site has been removed from the FOST.

## Document Title:

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, June 2003

Reviewer: Nicole Moutoux, Project Manager, USEPA, Region 9. Email Dated: June 12, 2003

Comment No.	Section/ Page No.	Comment	Response
6.	Page 5-2, §5.3	It is stated that no restrictions are needed due to IRP sites, however earlier it is noted that shallow groundwater associated with IRP site 24 will be restricted. This restriction should be stated here, included in the deed and shown on a map.	No restrictions are needed for IRP Site 24 since the portion of Site 24 associated with the shallow groundwater unit is not being transferred. Restrictions on any of the other IRP sites in the FOST are also not needed.
7.	Page 5-2, §5.2	Under notification, there is a phrase "including regulatory agency status." It seems to me what we want to say is regulatory agency "action" rather than status. Please make the change in this section and all other sections where this is found.	Text has been revised to be "regulatory agency action" throughout the document.
8.	Page 5-2, §5.3	As noted in the general comments above, the notification regarding soil containing PCBs used as back fill at site 19 must be included in the deed.	Information will be added to the deed regarding PCBs at Site 19.
9.	Page 5-4, §5.6	This section states that there are no restrictions due to PCBs. Yet in the sentence above, there is a statement that disposal of light ballasts containing more than 2 [sic] lbs of PCBs should be processed as regulated items. This should be a requirement that the transferee comply with and therefore should be a restriction in the deed.	Discussion of the need to handle PCB-containing light ballasts as regulated items is included as background information of general applicability, intended for the benefit of potential transferees. It does not reflect an affirmative obligation to be imposed on a transferee as a restriction or a condition of sale, but instead identifies that a transferee should act in accordance with all applicable legal requirements in the event that PCB disposal issues are encountered.

## Document Title:

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, June 2003

Reviewer: Nicole Mouloux, Project Manager, USEPA, Region 9. Email Dated: June 12, 2003

Comment No.	Section/ Page No.	Comment	Response
10.	Page 5-8, §5.11	Parcel IV should be listed in the bullets at the top of this page. Also on this page, under Facilities requiring an ACM Survey, there should be an affirmative requirement for a survey, rather than simply a prohibition of use or transfer pending a survey.	<p>Parcel IV has been added.</p> <p>Since DON is requiring the demolition of many of the structures on the property as a condition of sale (see Section 5.12), and since DON anticipates that the transferee(s) will be demolishing all or nearly all other structures on the property as well, DON has structured the FOST to restrict use or occupancy of each such structure requiring a survey until the transferee has either performed an ACM survey and any necessary abatement for such structure, or demolished such structure. The FOST therefore ensures that such structures either will remain unutilized, or will be utilized only after necessary surveys and abatement have been performed. No change made on account of this comment.</p>
11.	Page 5-9	Under Facilities with no ACM, again Parcel IV is not listed in the bullets.	Parcel IV has been added.

## Document Title:

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, June 2003

Reviewer: Nicole Moutoux, Project Manager, USEPA, Region 9. Email Dated: June 12, 2003

Comment No.	Section/ Page No.	Comment	Response
12.	Page 5-12 and 5-13, §5.1.2	The FOST must state that a deed restriction is required for areas that have not been sampled or cleared for Lead-Based Paint to prevent them from being used as residential until sampling and necessary abatement have been completed and obtained regulatory concurrence. Also, a deed restriction is required in order to prevent non-residential structures from being used as residential or as child-occupied structures.	<p>For residential structures within the scope of Title X and the joint EPA/DoD Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property: A Field Guide (1999)—except for structures within the San Joaquin and Wherry housing areas as identified in the FOST—the transferee will be required to demolish such structures as a condition of transfer. The deed restriction for residential structures discussed in the FOST will be amended to clarify that the transferee will be required to demolish such structures in accordance with all applicable legal requirements; that such structures shall be restricted from any use or occupancy whatsoever prior to demolition; and that, after such structures are demolished, the transferee shall conduct post-demolition sampling and abatement of any soil-lead hazards prior to occupation of any newly constructed residential buildings (including child-occupied structures).</p> <p>The FOST, on Page 5-11, has been modified to include the following deed restriction for non-residential structures "Non-residential structures constructed prior to 1978 may not be used for residential use or child occupied structures unless the transferee performs LBP evaluation(s) and any necessary abatement in accordance with all applicable local, state, and federal laws and other requirements".</p>
13.	Page 7-1, §7	Second paragraph: This only references the requirement for a covenant and access pursuant to 120(h)(3)(A) (ii) and (iii). As stated above, 120(h)(3)(A)(i) also requires notice in the deed.	Section 7 of the FOST addresses inclusion in transfer deeds of the covenant(s) through which DON promises to perform certain environmental cleanup actions subsequent to transfer of the property, as well as access rights associated with the performance of such cleanup actions. The hazardous substances notice referenced in CERCLA 120(h)(3)(A)(i) is addressed elsewhere in the FOST (e.g., at Section 5, second paragraph, and at Section 8).



## Document Title:

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, June 2003

Reviewer: Nicole Moutoux, Project Manager, USEPA, Region 9. Email Dated: June 12, 2003

Comment No.	Section/ Page No.	Comment	Response
14.	Page 8-1	The final paragraph, to be complete, should refer to all the requirements under 120(h)(3)(A), i.e., notice, covenant, and access, and that the DON will meet these requirements in the transfer. Also in the final paragraph, it is stated that the parcels are suitable for transfer by deed for the "intended purpose". It is not clear that the Navy has enough detail about the intended purpose for all areas of the base. For example one category for reuse includes education. The property may not be suitable for use as an elementary school.	<p>The final paragraph is consistent with typical language used in other Navy FOSTs, and simply states that requirements of CERCLA 120(h)(3) have been met. Section 8 will be revised to say that property is "suitable for transfer by deed for residential purposes."</p> <p>Please refer to response to DTSC's General Comment #6 regarding school sites.</p>
TYPOS			
1.		Several typos exist in the Acronyms and Abbreviations List. Please review and correct.	Acronyms and Abbreviations list has been checked and revised as appropriate.
2.	Page 4-4	The first paragraph on this page has a jumbled sentence midway through the paragraph.	Third sentence will be revised to read: "Kerosene was reportedly used to wash down the paved area at the site until approximately 1976."

## Document Title:

- (1) Draft Finding of Suitability to Transfer (FOST) and Draft Finding of Suitability to Lease (FOSL), Former Marine Corps Air Station, El Toro, CA, June 2003  
(Figures and Tables only)

Reviewer: Nicole Moutoux, Project Manager, USEPA, Region IX. Memo Dated: June 26, 2003

Comment No.	Section/ Page No.	Comment	Response
GENERAL COMMENTS			
1.		<p>The following table (see below) lists the discrepancies found between the tables included in the Finding of Suitability to Lease (FOSL) or the Draft Finding of Suitability to Transfer (FOST) and the tables in the Draft Final Environmental Baseline Survey (EBS).</p> <p>Please revise the FOSL or FOST to clarify these discrepancies. In cases where the Environmental Condition of the Property (ECP) has changed because of remedial or removal action or additional investigations, please revise the FOSL or FOST to include a reference that documents the post-EBS change that resulted in the change in ECP.</p>	Tables have been revised as appropriate.
2.		<p>The following facilities were found suitable for transfer in the FOST even though their ECP was listed as 6 or 7 in the EBS: VORTAC Facility (399), Air Operations (378), NBC Gas Chamber (832), and Hazardous and Flammable Materials Storehouse (921). Please provide documentation or a reference to the document in which the ECP of these facilities was changed to a category that would allow transfer.</p>	<p>All ECP types will be made consistent between the Final EBS and Draft Final FOST. Errors with ECP types have been corrected. Facilities 399 and 378 are in the runway area that changed from Type 7 to 3. Facility 832 is an error and should be Type 7. Facility 921 was incorrectly associated with TAA 634 and it should be a Type 1.</p>

## Document Title:

(1) Draft Finding of Suitability to Transfer (FOST) and Draft Finding of Suitability to Lease (FOSL), Former Marine Corps Air Station, El Toro, CA, June 2003  
(Figures and Tables only)

Reviewer: Nicole Moutoux, Project Manager, USEPA, Region IX. Memo Dated: June 26, 2003

Environmental Condition of Property		Response	
Facility	FOSL/FOST		
FOSL Table 1 / EBS Table A-1			
Facility 5	5 (ECP Categories defined below)	7	FOSL Table 1 has been revised to match EBS.
Facility 154	6	7	FOSL Table 1 has been revised to match EBS.
Facility 305	7	6	FOSL Table 1 has been revised to match EBS.
Facility 351	6	2b	FOSL Table 1 has been revised to match EBS.
Facility 378	1	7	FOSL Table 1 has been revised to match EBS.
Facility 398	2c	6	FOSL Table 1 has been revised to match EBS.
Facility 677	2c	3	FOSL Table 1 has been revised to match EBS.
Facility 824	6	4	FOSL Table 1 has been revised to match EBS.
Facility 897	6	3	FOSL Table 1 has been revised to match EBS.
Facility 1656	6	1	FOSL Table 1 has been revised to match EBS.
Facility 1719	6	7	FOSL Table 1 has been revised to match EBS.

## Document Title:

(1) Draft Finding of Suitability to Transfer (FOST) and Draft Finding of Suitability to Lease (FOSL), Former Marine Corps Air Station, El Toro, CA, June 2003  
(Figures and Tables only)

Reviewer: Nicola Moutoux, Project Manager, USEPA, Region IX. Memo Dated: June 26, 2003

Facility	Environmental Condition of Property		Response
	FOSL/FOST	EBS	
			match EBS.
Facility 1782	6	5	FOSL Table 1 has been revised to match EBS.
Facility 1783	6	5	FOSL Table 1 has been revised to match EBS.
Facility T-11	6	2a	FOSL Table 1 has been revised to match EBS.
Runway Infield Area	1 and 7	Not Included, Page A-20 indicates runways are 7	FOSL Table 1 has been revised to match EBS.
Aqua Chino Wash	2a	7	FOSL Table 1 has been revised to match EBS.
Bee Canyon Wash	6	7	FOSL Table 1 has been revised to match EBS.
<b>FOSL Table 3 / EBS Table 4-1</b>			
Runway Infield Area	7	3/7	PRL Runway Infield Area is Category 7.
<b>FOSL Table 6 / EBS Table 4-4</b>			
APHO 59	7	5	APHO 59 is Category 5.
<b>FOSL Table 8 / EBS Table 4-6</b>			
AST 390B	2a	1	AST 390B is Category 2a.

## Document Title:

(1) Draft Finding of Suitability to Transfer (FOST) and Draft Finding of Suitability to Lease (FOSL), Former Marine Corps Air Station, El Toro, CA, June 2003  
(Figures and Tables only)

Reviewer: Nicole Moutoux, Project Manager, USEPA, Region IX. Memo Dated: June 26, 2003

Facility	Environmental Condition of Property		Response
	FOSL/FOST	EBS	
FOSL Table 9 / EBS Table 4-7			
UST 463	2b	4	UST 463 is Category 4.
FOSL Table 11 / EBS Table 4-9			
Wash Rack 764	6	4	Wash Rack 764 is Category 4.
Wash Rack 759	6	5	Wash Rack 759 is Category 5.
FOSL Table 12 / EBS Table 4-10			
SRU 03A	5	7	SRU 03A is Category 7.
FOST Table 7 / EBS Table 4-6			
AST 376	2a	2b	AST 376 is Category 2b and has been corrected in the FOST.
UST 101	2e	No Entry	UST 101 is Category 7 and has been moved to the FOSL and added to the EBS.
UST 259	2e	No Entry	UST 259 has been removed from the FOST, this UST was found to be non-existent in 1997 and was erroneously included in the FOST.
UST 43	2a	2b	UST 43 is Category 2b and has been corrected in the FOST.

## Document Title:

(1) Draft Finding of Suitability to Transfer (FOST) and Draft Finding of Suitability to Lease (FOSL), Former Marine Corps Air Station, El Toro, CA, June 2003 (Figures and Tables only)

Reviewer: Nicole Moutoux, Project Manager, USEPA, Region IX. Memo Dated: June 26, 2003

	Environmental Condition of Property		Response
Facility	FOSL/FOST	EBS	
FOST Table 12 / EBS Table 4-14			
MSC ST19B	2b	2c	MSC ST19B is Category 2c and has been moved to FOSL.

Note 1: There were differences in the notes to the tables in each document

Comment No.	Section/ Page No.	Comment	Response
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## SPECIFIC COMMENTS

1.	FOST Table 1, Facilities within Parcels Proposed for Transfer, Page 14 of 16	It is unclear what facilities 9001 and 9002 are as they are not listed in the EBS nor shown on any of the figures in the FOST. Please identify these facilities, provide their ECPs and a reference to the document where their ECPs were established.	These facilities have been removed from the FOST since they are incorrectly listed and are located within the federally transferred property.
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## MINOR COMMENTS

1.	FOST Section 4.2.3.2, IRP Sites	LOCs in Parcel III-A, Page 4-9: The FOST indicates that portions of IRP 25 are situated in Parcel III-A. Figure 6, Installation Restoration Sites, and EBS Figure 4-5, Installation Restoration Program Sites, do not show a portion of IRP 25 in Parcel III-A. Please verify that a portion of IRP 25 is located in Parcel III-A.	Missing portion of IRP Site 25 has been added to the EBS and FOST figures.
2.	FOST Figure 6	Please include Installation Restoration Program (IRP) Site 6 on this figure.	IRP Site 6 is shown in Parcel II-A in the appropriate figures (now Figure 4 and Attachment 6).

## Document Title:

- (1) Draft Finding of Suitability to Transfer (FOST) and Draft Finding of Suitability to Lease (FOSL), Former Marine Corps Air Station, El Toro, CA, June 2003  
(Figures and Tables only)

Reviewer: Nicole Moutoux, Project Manager, USEPA, Region IX. Memo Dated: June 26, 2003

Comment No.	Section/ Page No.	Comment	Response
3.	FOST Table 10, PCB Transformers and PCB Transformer/Equipment Storage Areas, Page 5 of 7	The ECP Category was inadvertently left off the table for Transformer ID PCB T057. Please provide this ECP Category for PCB T057.	Table has been updated; the transformer is Category 1.
4.	FOST Table 13, Environmental Factors Considered, Page 1 of 1	For completeness, please include Parcel V-A on the table.	Parcel V-A has been added to the appropriate table (currently Table 12).

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
<b>GENERAL COMMENTS</b>			
1.		Please ensure consistency between this Finding of Suitability to Transfer (FOST), the most recent versions of the Environmental Baseline Survey (EBS) and Finding of Suitability to Lease (FOSL). Currently, there are inconsistencies among these documents.	A review of information contained in each of the documents has been conducted to ensure consistency.
2.		Please ensure that text, tables and figures within this FOST are consistent with one another as discussed in the specific comments below.	A review of text, tables, and figures in each of the documents has been conducted to ensure consistency.
3.		On May 27, 2003, the Irvine City Council adopted Resolution No. 03-60, certifying the Final Environmental Impact Report (EIR) for the Orange County Great Park and approving an amendment to the City's General Plan. The information about the EIR should be included in the FOST and referenced in Section 9 of the FOST. Please refer to Specific Comment #17 below for elaboration on this matter.	The City of Irvine's EIR is not a basis for the FOST and is not used as a reference in the FOST. Since FOSTs are not dependent upon whether a local community CEQA document has been prepared, this FOST will remain consistent with previously approved FOSTs and will not include reference to the City of Irvine's EIR. Please also refer to response to General Comment #4 for supplemental information.
4.		<p>Please explain why the Navy chose to divide the FOST properties into 5 parcels (I-A through V-A), rather than into more than 30 parcels outlined in the City of Irvine's Orange County Great Park Overlay Plan, which demonstrates the ultimate proposed reuse of the property. It's important to know the proposed reuse of a particular piece of property when trying to determine its suitability for transfer.</p> <p>The Department of Defense (DoD) policy, Finding of Suitability to Transfer for BRAC Property, Memorandum dated 1 June 1994, states, "After completion and review of the EBS, the intended use analysis, and any available local community reuse plan, the DoD Component will sign a FOST once a determination has been made that the property is suitable for transfer by deed for the intended purpose, if known, because the requirements of CERCLA Section 120(h)(3) have been met for the property, taking into account the potential risk of future liability. The DoD Component will provide a copy of the signed FOST to the regulator..."</p>	The Navy's conveyance strategy, including parcelization and the finding of suitability to transfer, is not tied to or dependent upon any proposed City of Irvine development plan. With respect to the evolution of potential reuses after MCAS El Toro was listed for closure in the 1993 Round of BRAC, from 1994 through 2002, the County of Orange, which became the Local Reuse Authority (LRA) under BRAC in 1996, proposed a commercial aviation use for El Toro. This proposal was approved as a BRAC reuse plan. In March 2002, the County voters overturned those planning efforts with the passage of Measure W. This referendum changed the Orange County General Plan policies for El Toro to a non-aviation use and recreational theme, with limited development intensities. After the March vote, the LRA decided that it would not prepare another BRAC reuse document for the property. Currently, the City of Irvine is attempting to annex the installation property. However, no City of Irvine plan has been approved as a BRAC reuse plan, and the City of Irvine has not sought such approval for any plan. Consequently, the Navy is not disposing of the property in connection with any particular reuse or redevelopment plan, and anticipates that reuse will ultimately be determined by local zoning applicable at the time of sale. See <i>DoD Base Reuse Implementation Manual (BRIM), Guidance on the Environmental Review Process To Reach a Finding of Suitability to Transfer [FOST] for Property Where Release or Disposal Has Occurred</i> , Section III.B.4, at pg. F-31. See also pgs. 2-4, 2-



**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
		<p>The Department of the Navy (DON) may not be consistent with the above mentioned DoD policy. The 2003 EBS has not yet been finalized and there is a local community reuse plan available (See General Comment #3 above). The Navy is making its finding in Section 8, stating that the five parcels are suitable for transfer by deed for the intended purpose, subject to the notifications and restrictions set forth in Section 5.0. However, this FOST does not discuss the intended purpose in any detail, except to say "mixed use". It would be important to know, for instance, if the intended use of a particular piece of property will be for education (kindergarten through 12<sup>th</sup> grade), residential, commercial, industrial, purposes to determine if any hazardous substance releases are compatible with the planned use.</p> <p>While the Navy included Figure 3b, Transferable/Lease Areas and City of Irvine Proposed Reuse Designations, DTSC was informed that this information will probably not be part of the Final FOST. Please explain why it might not be included in the Final FOST. Although the sources listed for this figure include the EBS, and the City of Irvine and the Heritage Fields websites, none of these sources are included in Section 9. Is the City of Irvine source the EIR ? Why is the Heritage Fields website listed as a source?</p>	<p>8, and F-81 of the BRIM.</p> <p>The Navy's conveyance strategy and preparation of this FOST are consistent with the mentioned policy. The policy only requires Navy to make a finding based on an intended purpose if that purpose is known. Similarly, neither law nor policy requires that disposal of BRAC property be linked to or based on a reuse plan. In the absence of an approved reuse plan, all the property the Navy has included in this FOST is suitable for use under the most stringent use standard (residential), which means the property will be suitable for any land use that may ultimately be approved by the local communities. Section 8 has been revised to say that property is "suitable for transfer by deed for residential purposes."</p> <p>Figure 3b was previously provided for informational purposes only, and will not be included in the FOST.</p>
5.		<p>In accordance with the DON guidance, Principles and Procedures for Specifying, Monitoring and Enforcement of Land Use Controls and Other Post-ROD Actions dated March 17, 2003, for any particular property in which a ROD is issued, the FOST should describe the reasonably anticipated land use and the risk assessment assumptions for this use. In accordance with DOD Guidance on the Environmental Review Process to Reach a Finding of Suitability to Transfer (FOST) for Property Where Release or Disposal Has Occurred dated June 1, 1994, the FOST should include an analysis of intended use of the property, the rationale for determining the suitability for transfer, and a listing of specific recommended restrictions on use of the</p>	<p>All property in the FOST is suitable for residential use, and, therefore, any and all reasonably anticipated land uses have been adequately considered. A number of structures on the property will be subject to certain notifications and non-CERCLA restrictions; however, these do not impact the property's suitability for residential use. All supporting RODs that pertain to transferable property are No Further Action RODs and do not include any CERCLA Institutional Controls.</p>

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(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
		<p>property, if any, to protect human health and the environment. The restrictions would include those documented in a ROD or equivalent decision document.</p> <p>The FOST should identify all property for which a ROD or other decision document contains land use restrictions or other institutional controls that are necessary to protect human health and the environment. The environmental restoration process and how those restrictions or controls will be implemented should also be described. Specifically, the FOST should describe the boundaries of the portion of Site 24 that is proposed to be transferred and any land use restrictions or institutional controls that are necessary on that portion. The FOST should verify that all No Further Action designations for property to be transferred, including IRP LOCs and PRLs, are based on an assumption of unrestricted land use.</p>	<p>IRP Site 24, the Vadose Zone, will not be considered suitable for transfer and is no longer included in the FOST.</p> <p>A statement has been added to the second paragraph of Section 4.1 to clarify that NFA designations for LOCs within property to be transferred are based on an assumption of residential land use.</p>
6.		<p>Because the Navy has identified the reuse as "mixed land use" which could include education, DTSC will be unable to concur in a finding of suitability for any parcels that may be used for school sites, meaning kindergarten through grade 12. Pursuant to the California Education Code, section 17210 et seq., a separate and comprehensive environmental review is required for sites where state funds will be used for property acquisition or school construction. This law requires that DTSC make a determination as to the suitability of the property for school use based on this review. The review process includes an evaluation of whether hazardous materials on the property have been or could be released that would endanger students. Because this separate environmental review has not been conducted for parcels that may be used for school sites, DTSC cannot determine if those parcels are suitable for the intended use. Please identify which of the five parcels proposed for transfer may be used as future school sites.</p>	<p>Any requirements associated with the evaluation of proposed school sites for compliance with the CEC are the responsibility of the transferee, and not the DoN.</p> <p>The requirements of California Education Code, section 17210 et seq., do not apply directly to the Navy. This State law requires that school districts that are recipients of State school bond funds for school site acquisition or school constructions conduct a specific environmental review and obtain a DTSC determination as to whether or not the property is suitable for school use. In the context of the pending sale of property, it requires that the transferee of the parcels conduct these environmental reviews and obtain the DTSC determination. Nothing prohibits the transferees and DTSC from implementing these requirements after the transfer.</p> <p>Because the requirements of California Education Code, section 17210 et seq., are not promulgated requirements of general applicability and do not apply to the Navy, they are not legally binding upon the Navy's CERCLA determinations and the CERCLA covenant. Therefore, the conclusion reached in the FOST that property is "suitable for transfer" will remain the Navy's determination. This comment will be included in the Final FOST as</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

*Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003*

Comment No.	Section/ Page No.	Comment	Response
			an Unresolved Comment.
7.		<p>The former El Toro Marine Corps Air Station is a permitted hazardous waste facility, subject to the corrective action requirements of the federal Resource Conservation and Recovery Act (RCRA) and the state Hazardous Waste Control Law. Any transfer of property must comply with the requirements for change of ownership under the hazardous waste laws, including appropriate permit modifications. The Navy has committed to conducting the appropriate procedures needed to determine that the Navy's corrective action obligations are complete as stated in the letter from Ms. Laura Duchnak, BRAC Operations Officer, to Mr. Frederick S. Moss, Division Chief, DTSC Permitting Division, dated March 6, 2003.</p>	<p>This response addresses DTSC's July 17, 2003, General Comments 7 and 8 as well as related points made in DTSC's July 17 transmittal letter.</p> <p>DON has revised the Draft Final FOST to add the following provisions to respond to your comments:</p> <ol style="list-style-type: none"> <li>1. Clarification of the purpose of the FOST.</li> <li>2. Address DTSC's substantive concerns regarding the completion of RCRA corrective action by including RCRA corrective action discussions and findings in the Draft Final FOST. Revised Tables 3 through 11, summarizing past decisions regarding completion of response and corrective actions at SWMUs and Locations of Concern (LOCs) will also be included. The revised tables are equivalent to drafts of DTSC's proposed permit modification tables provided to our staff in July 2003.</li> <li>3. A description of the relationships between RCRA Subtitle C corrective action, RCRA Subtitle I UST corrective action, and FOST determinations.</li> <li>4. A RCRA completion of corrective action finding.</li> </ol> <p>Information pertaining to RCRA corrective action will be included with the Invitation for Bid (IFB) for the public sale of MCAS El Toro. This will provide full disclosure of both CERCLA and RCRA program information to potential bidders.</p> <p>DoN understands that it is subject to RCRA corrective action requirements at MCAS El Toro under applicable statutes and regulations, as well as the Federal Facility Agreement (FFA) for former MCAS El Toro. The FFA was finalized in October 1990. It specifically requires that RCRA corrective action requirements for Solid Waste Management Units (SWMUs) be addressed in the FFA process. See Subsections 1.1(b), 1.2(e), 3.1, 17.1, 17.2, 17.3, and 19 of the FFA. This is the "appropriate" process referenced in Ms. Laura Duchnak's March 6, 2003 letter.</p> <p>A RCRA Part B permit was issued to DoN for hazardous waste management at MCAS El Toro in June of 1993 and required corrective</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
			<p>action at Solid Waste Management Units (SWMUs) located at the installation. The RCRA Part B permit was consistent with the FFA and incorporated the FAA by reference as required by Section 17.3 of the FFA. The permit provided in relevant part: "The activities required by the Agreement are intended to satisfy the corrective action requirements of RCRA section 3004(u) and (v), 42 U.S.C. Section 6924(u) and (v). The Agreement and any schedules contained therein are hereby incorporated by reference as the schedule for completing corrective action at the facility..." (Subsection V.A.1 of the permit).</p> <p>The Part B permit further provided that "Prior to the termination of the Agreement, any response or corrective action shall be governed by the terms of the Agreement...Following termination of the Agreement, Section V.B through Section V.F of the permit applies to any such release."(Subsection V.A.2 of the permit). The permit modification procedures set forth in Section V.B. are among those suspended until termination of the FFA. Consistent with these provisions of the FFA and permit, no permit modification to incorporate response or corrective action decisions was requested or executed by DTSC at MCAS El Toro until 2002 (see below).</p> <p>DTSC sent a letter to DoN on March 8, 1996, stating that the RCRA Part B permit for MCAS El Toro was terminated based upon certification of closure of the regulated unit that had initially triggered the permit requirement (Attachment 7). DTSC and the other FFA signatories' intention at that time was for the FFA process to continue to follow through and resolve SWMU corrective action issues at MCAS El Toro with finality. Such reliance upon the FFA is consistent with recent letters that DoN has received concerning completion of corrective action under Federal Facility Site Remediation Agreements (FFSRAs) for the FISC Alameda Annex and Mare Island Shipyard (Attachment 7).</p> <p>Investigation and cleanup of SWMUs at MCAS El Toro continued under the FFA framework after receipt of the March 8, 1996 permit termination letter, and there was no further discussion of the terminated permit in meetings with the regulatory agencies until late 2002. In September of 2002, DTSC met with City of Irvine staff and discussed the possibility that a RCRA permit modification may be needed to document completion of RCRA corrective action at MCAS El Toro. Discussion and correspondence then began on this issue between DON and DTSC (Attachment 7). DTSC</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

*Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003*

Comment No.	Section/ Page No.	Comment	Response
			<p>referenced USEPA's February 25, 2003 "Final Guidance on Completion of Corrective Action at RCRA Facilities" (68 Federal Register 8757, February 25, 2003) as a key factor in their proposal to undertake this proceeding.</p> <p>USEPA's February 25, 2003 "Final Guidance on Completion of Corrective Action at RCRA Facilities" does not mandate that DTSC undertake a permit modification (68 Federal Register 8757, February 25, 2003). This guidance has been discussed with USEPA staff, and they have assured DON that the policy does not mandate that the State require permit modifications at MCAS El Toro, and that the State has flexibility and discretion in implementing the policy. Although the policy indicates that permit modification procedures are generally appropriate, it also states "Of course, if a facility's permit or order provides otherwise, these procedures would not be appropriate at a facility" (Footnote 16, page 8763). The policy also acknowledges that Federal Facilities such as MCAS El Toro present unique issues (page 8760).</p> <p>The RCRA Part B permit expired under its own terms on August 18, 2003. However, the provisions of the FFA requiring compliance with the corrective action requirements of RCRA sections 3004(u) and (v), 42 U.S.C. Sections 6924(u) and (v), remain in effect.</p> <p>DON is in the final stages of completing this Finding of Suitability for Transfer (FOST) in order to support a public sale of the clean portions of MCAS El Toro early next year. This FOST is being developed in support of DON's compliance with Paragraph 28 of the FFA and to conform to Department of Defense base closure policy. DTSC has participated in the development and review of this FOST and submitted comments on the Draft FOST on July 17, 2003.</p> <p>The Department of Navy (DON) strongly requests that DTSC not pursue DTSC's "self-initiated" modification of the recently expired RCRA Part B permit for Marine Corps Air Station (MCAS) El Toro to review completion of RCRA corrective action at that installation. The proposed modification is contrary to DTSC's commitments in the MCAS El Toro Federal Facility Agreement (FFA) as well as the provisions of the expired permit. It unnecessarily duplicates work completed under the FFA as well as work nearing completion in the Finding of Suitability for Transfer (FOST) for the clean portions of MCAS El Toro. It is also unclear what authority would be used to modify a permit that has expired.</p>

## Document Title:

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
			<p>Streamlining and consolidating procedures to optimize protection of human health and the environment and efficiently and effectively address the substantive requirements of overlapping environmental statutes is supported by national policy guidance (See <u>Coordination Between RCRA Corrective Action and Closure and the CERCLA Site Activities</u>, Steven A. Herman, Assistant Administrator, USEPA, to RCRA/CERCLA National Policy Managers and Regions I-X, September 24, 1996 (Attachment 7)). DTSC's proposed permit modification action duplicates DON's FOST development effort at MCAS El Toro and conflicts with this policy guidance. The proposed permit modification process would have the effect of creating greater uncertainty and undermining finality by reopening prior cleanup decisions made over the past decade under the FFA and other applicable authorities. See section titled "Coordination Between Programs" in Attachment 7. This could disrupt DON's pending sale of MCAS El Toro.</p> <p>DTSC concurred with the Final Environmental Baseline Survey by letter dated September 25, 2003 (Attachment 7). This letter concurs with the conclusions of the EBS, which include conclusions regarding property classification and suitability of property for transfer. As a result, we believe that this indicates that substantive technical DTSC concerns regarding the adequacy of past cleanup decisions at MCAS El Toro raised in its July 17, 2003, comments on the Draft FOST are resolved. DON will address the substantive completion of RCRA corrective action by including RCRA corrective action discussions and findings in the Draft Final FOST.</p> <p>DON is confident that after further review of the requirements that are in place to ensure protection of human health and the environment and the integration of RCRA corrective action discussions and findings, DTSC will find that all necessary obligations are adequately addressed. This transfer of MCAS El Toro is a national priority for DON and is clearly important to the State of California, which will directly benefit as the land is put into productive use and the land sale proceeds are applied to environmental remediation at MCAS El Toro and other BRAC installations.</p>
8.		The former El Toro Marine Corps Air Station is a hazardous waste facility subject to RCRA. Requirements for corrective action under RCRA sections 3004(u) and (v) therefore apply to all property at the facility. The sites that have not received a regulatory determination that corrective action is complete are subject to corrective action requirements,	Please refer to response to General Comment #7.

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

*Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003*

Comment No.	Section/ Page No.	Comment	Response
		including financial assurance requirements, under RCRA. This applies to all sites, including those contaminated by petroleum. The landowner, whether the Navy or the transferee, is obligated to conduct corrective action as necessary to protect human health and the environment unless a regulatory determination that corrective action is complete has been made.	
9.		Not only must the Navy provide justification for why it believes the property proposed in this FOST is suitable for transfer, but it must also provide justification for why it believes the adjacent properties, including carve-out areas and other IRP sites, will not negatively impact the properties proposed for transfer. Please include these justifications in the FOST.	<p>The EBS describes evaluation of properties adjacent to the entire MCAS El Toro installation and impacts, if any, associated with it, including the potential migration of contamination onto the installation from such properties.</p> <p>Carve-out areas include all Further Action (FA) LOCs, including sites associated with groundwater plumes. These FA LOCs are in various phases of environmental restoration as described in the EBS, having undergone extensive site characterization under BCT oversight (with the exception of certain PRLs and petroleum sites that are undergoing further evaluation). The carve-outs were arrived at by including adequate buffer zones as specified in the decision documents such as RODs.</p> <p>Buffer zones for PRL sites, including those yet to be investigated (via sampling, if required) were conservatively based on background review of the historic operations conducted to date. Typically, if specific locations within a building or its vicinity were identified with historic operations that necessitate further evaluation, then the entire building/vicinity were identified as the extent of the PRL. In some cases where discrete areas were identified for further evaluation, then that specific area was identified as the extent of the PRL. The EBS (and FOSL) PRL table has been revised in accordance with DTSC's comment on the Feb. 2003 Draft EBS to provide additional information in the Notes column pertaining to historic operations. For PRLs with sewer connection investigations, buffer zones typically extend to the tie-in with the sewer main connection. Furthermore, PRLs were generally grouped into larger carveouts, thus increasing the buffer zone available for the PRLs. Please note that PRLs that are yet to be investigated will be subject to further evaluation before determining the need for intrusive sampling/analysis.</p> <p>Potential impact to transferable property from property adjacent to and outside the boundaries of former MCAS El Toro owned by other parties, as well as FOSL property within MCAS El Toro boundaries, is not anticipated.</p>

## Document Title:

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
			<p>"Adjacent property" addressed under CERCLA Section 120 (h)(4)(A)(v) is discussed in detail in Chapter 5 of the EBS. No impact to transferable property resulting from such adjacent property was identified. FOSL property is not considered "adjacent property" under CERCLA Section 120 (h)(4)(A)(v); however, DON's justification for believing that FOSL property will not impact the properties proposed for transfer is reasonably based on the following:</p> <ol style="list-style-type: none"> <li>1. Sufficient site characterization conducted under regulatory oversight (extent of contamination well defined)</li> <li>2. Buffer zones established in RODs for IRP sites</li> <li>3. Conservative estimates of the extent of probable contamination used for sites needing further evaluation</li> </ol> <p>Based on these factors, contamination from adjacent or FOSL property is not expected to impact transferable property. Text regarding this discussion has been added to the FOST in Section 4.1.</p>
10.		<p>This FOST includes numerous Area Type 2 underground storage tanks (UST) and above ground storage tank (AST), and four Area Type 4 UST, which have received no further action (NFA) concurrence from the Regional Water Quality Control Board (RWQCB) or the Orange County Health Care Agency (OCHCA). Because the RWQCB uses other criteria than risk based cleanup standards to make NFA determinations for UST and AST sites, the FOST should be supplemented with information on past response actions and cleanup standards used for those sites. According to Table 7, the OCHCA provided NFA concurrence on a significant portion of the UST sites, however, until DTSC has a better understanding regarding the cleanup standards used by the OCHCA, it cannot include them in this comment.</p>	<p>DoN does not understand or agree with DTSC's comment that the "...the RWQCB uses other criteria than risk based cleanup standards to make NFA determinations for UST and AST sites..." DTSC and the Santa Ana RWQCB/Orange County Health Care Agency (OCHCA) implement substantively equivalent and nearly identical statutory cleanup standard in their overlapping corrective action programs for USTs: <b>adequate protection of human health and the environment</b>. This underlying standard is codified in the sections of the California Health and Safety Code and implementing regulations relating to each of their authorities. The RWQCB and OCHCA are required by law to adequately protect human health and the environment in their corrective action decisions, and DoN believes that they have faithfully carried out their duties. DTSC was informed of progress on the RWQCB/OCHCA corrective action decisions through the annual Base Realignment and Closure (BRAC) Cleanup Plan and Business Plan updates and monthly BRAC Closure Team meetings over the past decade and has raised no concern or objections to their methodology or conclusions up to this point in time.</p> <p>UST corrective action cleanup decisions at MCAS El Toro have been conducted in accordance with State regulations set forth Title 23 California Code of Regulations Chapter 16. These regulations specifically define</p>



**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
			<p>"corrective action" as "...any activity necessary to investigate and analyze the effects of an unauthorized release; propose a cost-effective plan to <b>adequately protect human health, safety, and the environment</b> and to restore or protect current and potential beneficial uses of water; and implement and evaluate the effectiveness of the activity(ies)... (<i>emphasis supplied</i>)" (Title 23 CCR §2720). Furthermore, §2725(c) of the regulations sets forth requirements for Corrective Action Plans prepared by responsible parties and states that, "The regulatory agency shall concur with the Corrective Action Plan after determining that implementation of the plan will <b>adequately protect human health, safety, and the environment</b> and will restore and protect current potential beneficial uses of water (<i>emphasis supplied</i>)."</p> <p>NFA letters issued by the OCHA specifically stated that NFA determinations were based upon §2721(e) of those regulations which provides "Upon completion of required corrective action, the regulatory agency shall inform the responsible party in writing that no further work is required at that time, based on available information."</p> <p>State laws addressing USTs were recently amended and retained the same cleanup standard. More specifically, the amended Health and Safety Code (HSC) §25296.10(a) now provides that the SWRCB "...shall develop corrective action requirements for health hazards and protection of the environment based on the severity of the health hazards and protection of the environment,..." HSC §25296.10(b) provides, "Any corrective action conducted pursuant to this chapter shall ensure <b>protection of human health, safety, and the environment</b> (<i>emphasis supplied</i>)."</p> <p>The cleanup standard set forth in DTSC's corrective action authority for addressing releases from SWMUs is identical to the standard for USTs implemented by the RWQCB and OCHCA. Title 22 California Code of Regulations §66264.101(a) provides, "The owner or operator of a facility seeking a permit for the transfer, treatment, storage, or disposal of hazardous waste shall institute corrective action <b>as necessary to protect human health and the environment</b> for all releases of hazardous waste or constituents from any solid or hazardous waste management unit at a facility, regardless of the time at which it was placed in such unit (<i>emphasis supplied</i>). See also HSC §§25187 and 25200.10(b).</p> <p>Furthermore, DTSC concurred with the Final Environmental Baseline Survey by letter dated September 25, 2003. This letter concurs with the</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
			conclusions of the EBS, which include conclusions regarding property classification and suitability of property for transfer. The letter makes no mention of DTSC concerns about UST and AST sites with No Further Action (NFA) concurrence from the RWQCB or OCHCA. As a result, we believe that this indicates that DTSC concerns raised in its July 17, 2003, comments on the Draft FOST are resolved.
11.		The FOST should specify how and when legal descriptions of property boundaries will be determined and should state that land surveys will be performed to fix the property boundaries prior to transfer.	The Navy concurs that legal descriptions do not need to be included in the FOST. Legal descriptions will be completed prior to signing the deeds. A statement to this effect will be added to the Final FOST per DTSC's request. Furthermore, the FOST contains figures that show transfer parcels and transferable property boundaries that are sufficient for bidding purposes.
12.		Is any of the property, proposed for transfer in this FOST, impacted by perchlorate? If yes, please provide the appropriate notifications and/or restrictions in Section 5.0.	Basewide and site-specific perchlorate investigations conducted to date do not indicate any current impact to properties proposed for transfer. A detailed discussion of perchlorate sampling from 1998, 1999 and follow-up sampling throughout the base is found in the Final EBS.
13.		Please include a figure that shows the entire base and provides the following information: property that has already transferred, property that is pending transfer, property that is currently being leased, property proposed for transfer in this FOST and property proposed for lease in the accompanying FOST. This type of information is important to help the reader visualize the information presented in Section 2 (Property Description) of this FOST. Please refer to MCAS Tustin's FOST 3 (Transfer Parcels 23, 29, 34, 35 and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41), Figure 2 for an example.	<p>Information regarding transfers and pending transfers has been added as requested. This information will be added to Figure 2 in the Draft Final FOST.</p> <p>Our determination that the property is suitable for transfer is based upon assessment of the environmental conditions of the property, whether it is leased or not. Therefore, the existence of the leases has no affect upon our ability to determine whether the property is suitable for transfer. All but two of the existing leases will be terminated upon conveyance. One of the two exceptions is Bordier's Nursery, a wholesale grower of ornamental shrubbery, perennial plants, roses, and Christmas products, including poinsettias, rosemary, and container grown Christmas trees. Bordier's Nursery is in Parcel I, and has been operating on the same site since 1964. The other exception is the Irvine Unified School District, which uses property in Parcel II for administrative purposes and has been using the site since 1991. The conveyance of the leased properties will be subject to the new owner agreeing to continue the existing leases.</p> <p>Property proposed for transfer and for lease (the purple shaded areas) is provided in Figure 2</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

*Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003*

Comment No.	Section/ Page No.	Comment	Response
14.		Please include a figure that shows all of the Installation Restoration Program Sites (including the contaminated groundwater plumes) and indicate which IRP sites are NFA and which require further action, the parcel boundaries, the FOST boundaries, FOSL boundaries, buildings/structures and roadways. There is a similar figure in the MCAS El Toro Draft Final EBS (April 2003), Figure 4-5. Please refer to MCAS Tustin's FOST 3 (Transfer Parcels 23, 29, 34, 35 and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41), Figure 9 for an example.	Attachment 6 shows the IRP sites within the FOST-able areas. These IRP sites have received NFA concurrence.  Figure 2 and Attachment 6 show carve-outs, transferable parcels, IRP Sites (including plumes), parcel boundaries, buildings/structures and roadways.
15.		There is not much discussion in the FOST regarding the previous EBS and the most current EBS (April 2003). Since the EBS provides a basis for the finding of suitability, please include a more in-depth discussion of the EBS and how it relates to this FOST. Please refer to MCAS Tustin's FOST 3 (Transfer Parcels 23, 29, 34, 35 and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41), Section 5 for an example.	A section has been added to briefly discuss the earlier EBS and the current EBS, and how the EBS process relates to the FOST.
16.		Please include information in the FOST about the carve-out areas in the FOSL. It is important for the reader, including transferees and lessees, to have an understanding of the properties associated with the FOST and FOSL and the notifications and restrictions that apply. Please refer to MCAS Tustin's FOST 3 (Transfer Parcels 23, 29, 34, 35 and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41), Sections 2 and 7 for an example of the type of information that should be included in this FOST.	Text has been added as follows (3th paragraph, Section 1):  A Finding of Suitability to Lease (FOSL) has also been prepared to support the lease of areas not suitable for transfer at this time. Such areas encompass LOCs where further evaluation and/or actions are ongoing or required. Boundaries of these areas have been defined and designated as "Carve-out Subparcels" within each of Parcels I, II, III, and V. The FOSL establishes restrictions that will be imposed on the leased "Carve-out Subparcels" in order to allow use of the property without impeding environmental cleanup and to prevent human exposure to potential contaminants while remedial action is being conducted. Sites not suitable for transfer include areas where further evaluation, implementation of response actions, or completion of response actions and subsequent regulatory agency concurrence is required. (DON strongly recommends that this FOST be read in conjunction with the <i>Finding of Suitability to Lease, for Carve-outs Within Parcels I, II, III, and V, Former Marine Corps Air Station, El Toro, California</i> , October 2003.) This paragraph will be the extent of cross-referencing in the FOST.
17.		Please provide a brief discussion, in the FOST, regarding the reuse plan(s) and the local reuse authority (LRA).	Please see response to General Comment #4. A discussion regarding the reuse plans and LRA has been added to the Purpose section of the FOST as follows: "With respect to the evolution of potential reuses after MCAS El Toro was

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

*Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003*

Comment No.	Section/ Page No.	Comment	Response
			listed for closure pursuant to the Defense Base Closure and Realignment Act of 1993, as amended, the County of Orange, which became the Local Reuse Authority (LRA) under BRAC in 1996, proposed, during the period between 1994 and 2002, a commercial aviation use for El Toro. This proposal was submitted as a BRAC reuse plan. In March 2002, the County voters overturned those planning efforts with the passage of Measure W. This referendum changed the Orange County General Plan policies for El Toro to a non-aviation use and recreational theme, with limited development intensities. After the March vote, the LRA decided that it would not prepare another BRAC reuse document for the property. Currently, the City of Irvine is attempting to annex the installation property. However, no City of Irvine plan has been approved as a BRAC reuse plan, and the City of Irvine has not sought such approval for any plan. Consequently, the Navy is not disposing of the property in connection with any particular reuse or redevelopment plan, and anticipates that reuse will ultimately be determined by local zoning applicable at the time of sale. Moreover, all property in the FOST is suitable for residential use, which is the most stringent of any land use."
18.		All attachments were missing from the June 2003 version of the FOST, therefore DTSC was unable to review and comment on them. Please be sure to include them in the draft final.	Attachments has been included in the Draft Final FOST.
19.		Please ensure that the identification numbers in the tables match the identification numbers in the figures (i.e., RFA 28 vs. RFA 028, RFA 1 vs. RFA 001) for consistency.	Table and Figure IDs have been coordinated.
20.		Please be consistent in the use of the terms "proposed" and "suitable" throughout the FOST.	In those instances where 'proposed' and 'suitable' are interchangeable in meaning, 'proposed' has been changed to 'suitable.'
21.		Please be sure to use the following terms consistently and appropriately throughout the FOST: building, structure, facility.	Document has been reviewed and revised as appropriate to ensure consistency for the use of the terms building, structure, and facility.
22.		Grammatical and typographical errors exist in the FOST and should be corrected.	A technical editor has reviewed the FOST and a spell check has been conducted.
<b>SPECIFIC COMMENTS</b>			
1.	Figures, page vi.	Figure 2 – The title listed here is not the same as the title shown on Figure 2. Please make the appropriate change. Figure 3 – There are two Figure 3's included in this	The Table of Contents for figures presented in the document has been corrected.

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
		document, but there is only one listed on this page. Please delete Figure 3 and include Figures 3a and 3b with the appropriate titles. Figures 8a and 8b - There are three Figure 8's included in the document, but there are only two listed on this page. Please include Figure 8c on this page with the appropriate title.	
2.	Attachments, page vii.	The attachments are missing from the June 2003 FOST. DTSC cannot complete our review until we receive that information. This page states that the NFA concurrence letters will be included in the Final FOST. Please include the letters in the Draft Final FOST as well. This page also states that DoD policies on asbestos and lead-based paint are included in the attachments. Please also include the DoD policy on radon. Finally, comments/response to comments should not only be included in the Final FOST, but also in the Draft Final.	<p>The NFA concurrence letters has been provided as PDF files on a CD within the Draft Final FOST.</p> <p>Attachments for DoD policy regarding lead, asbestos, and radon and responses to comments has been included in the Draft Final FOST.</p>
3.	Acronyms and Abbreviations, page ix.	Please include "JEG - Jacobs Engineering Group" because it is used in Section 9 of the document.	JEG has been added to the Acronyms and Abbreviations.
4.	Section 1 (Purpose), Page 1-1, Paragraph 1, Second Sentence.	This sentence makes it sound as though the five parcels, in their entirety, are suitable for transfer. However, each of the parcels, except for Parcel IV, has areas that are not suitable for transfer and are included in a FOSL that was prepared concurrently with this FOST to support a Lease in Furtherance of Conveyance (LIFOC) for the carve-out areas. So, it's actually portions of Parcels I-A, II-A, III-A and V-A that the Navy is proposing to transfer? Please provide a more clear discussion.	<p>The sentence (and other applicable references in the title and elsewhere in the document) has been revised as follows:            "Portions of Parcels I, II, III and V (identified respectively as I-A, II-A, III-A, and V-A), and all of Parcel IV, have been identified as suitable for transfer."</p> <p>Note: With respect to such portions of these parcels not suitable for transfer at this time, please also see the Navy's FOSL. Please also refer to response to General Comment #16 above.</p>
5.	Section 1 (Purpose), Page 1-1, Paragraph 1, Last Sentence.	This sentence is confusing. Please explain how the parcels were developed based on the "...reuse areas proposed by the City of Irvine in the Heritage Fields Reuse Plan." Also, please explain what the Heritage Fields Reuse Plan is.	The last sentence has been revised to delete reference to the reuse plan, since parcels were not developed based on these plans.
6.	Section 1 (Purpose), Page 1-1, Paragraph 3.	Please see Specific Comment #4 above and also include the total acreage associated with the FOSL.	Paragraph 3 does not make reference to parcels; accordingly the use of "portions of parcels" is inapplicable. Total acreage associated with the FOSL has been included in the FOSL.

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
7.	Section 1 (Purpose), page 1-1, last paragraph	It says "Environmental documentation . . . used to prepare the EBS, is available at Building 83 at former MCAS El Toro." The FOST should state whether this environmental documentation is part of the Administrative Record for the site.	Text has been added to clarify the environmental documentation is part of the administrative record.
8.	Section 2 (Property Description), Page 2-2, Paragraph 1.	Why isn't the 2003 EBS mentioned here? Also, this paragraph mentions the 2001 and 2002 BRAC Business Plans, but the citation is "(USMC 2001, 2003)". Please correct the discrepancy.	Text has been corrected.
9.	Section 2 (Property Description), Page 2-1.	The acreage listed on this page doesn't seem to add up correctly, for instance in paragraph three, $2,319 + 2,419 = 4,738$ acres, not 4,710 acres. Please make the necessary corrections to this FOST and ensure correlation between the FOST, EBS and FOSL with regard to acreage.	The calculation has been corrected in accordance with the comment.
10.	Section 2 (Property Description), page 2-1,	Lists the former MCAS property that has already been transferred (23 acres to CalTrans in 1998 and 897 acres to the FAA in 2001). This FOST should cite to the RODs and the FOSTs that were used as the basis for these two prior transfers and state whether the documents are in the Administrative Record for the site. Similarly, the description of the 74 acres currently pending transfer to the FBI should cite to the ROD and FOST for this property and state whether these documents are in the Administrative Record for the site.	The information requested is outside the scope of this FOST because it does not relate to property covered by the FOST. These properties are not evaluated in the EBS and are not part of the property considered in the FOST or FOSL. The information regarding these properties that have already been transferred is included for background information only. The environmental documentation for these properties is contained in the Administrative Record at El Toro and such a reference has been added to this section.
11.	Section 2 (Property Description), Page 2-1, Paragraph 6.	Please include the total number of acres currently being leased.	The total number of acres being leased has been added.
12.	Section 2 (Property Description), page 2-1,	Says that various buildings and areas, including 580 acres designated for agricultural outleases, are currently leased. The FOST should describe which of these leased buildings and areas are proposed to be transferred and whether existing leases would affect or be affected by the transfer of any property.	The FOST lists all the buildings that are in each of the parcels to be offered for sale. Please refer to General Comment #13 regarding leases.

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
13.	Section 2 (Property Description), Page 2-2.	The number of LOCs listed for Parcels I-A, II-A, III-A and V-A do not match the number of LOCs listed in Section 4.2. The number of structures listed for Parcel II-A doesn't match Table 1. Please correct the discrepancies.	Tables and text have been cross-checked to eliminate discrepancies.
14.	Section 2 (Property Description), page 2-2,	Says locations of concern (LOCs) within each parcel suitable for transfer are discussed in Section 4.2. Such LOCs are designated as "carve-out areas" in the draft FOST for El Toro. The relationship of parcels suitable for transfer, parcels suitable for leasing, areas currently being leased, areas already transferred and carve-out areas should be fully explained in the FOST.	Text has been added as follows (4th paragraph, Section 1):  A Finding of Suitability to Lease (FOSL) has also been prepared to support the lease of areas not suitable for transfer at this time. Such areas encompass LOCs where further evaluation and/or actions are ongoing or required. Boundaries of these areas have been defined and designated as "Carve-out Subparcels" within each of Parcels I, II, III, and V. The FOSL establishes restrictions that will be imposed on the leased "Carve-out Subparcels" in order to allow use of the property without impeding environmental cleanup and to prevent human exposure to potential contaminants while remedial action is being conducted. Sites not suitable for transfer include areas where further evaluation, implementation of response actions, or completion of response actions and subsequent regulatory agency concurrence is required. (DON strongly recommends that this FOST be read in conjunction with the <i>Finding of Suitability to Lease, for Carve-outs Within Parcels I, II, III, and V, Former Marine Corps Air Station, El Toro, California</i> , October 2003.)
15.	Section 2 (Property Description), Page 2-2.	There is an incorrect reference to Figure 3. It should reference Figure 3a. Please make the change.	Figure 3b will not be part of the Draft Final FOST and was previously provided for interim reference purposes only. The reference is now for Figure 2.
16.	Section 3 (Regulatory Coordination), page 3-1,	Says DTSC signed the FFA in 1990. Please note that the Department of Health Services signed the FFA. DTSC is a successor to the Toxic Substances Control Program of the Department of Health Services.	The text has been revised to clarify this chronological succession of signatory authority.
17.	Section 3 (Regulatory Coordination), Pages 3-1 and 3-2.	The information presented in paragraph 5 should be taken out of this section and placed in a new section titled, "National Environmental Policy Act Compliance". This new section should also contain information regarding the EIR (See General Comment #3 above).	Text has been made more consistent with the text used in the Tustin FOST 3.  EIR information will not be addressed. Please see response to General Comment #3.

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
18.	Section 3 (Regulatory Coordination), Page 3-2, Last Paragraph.	Please refer to Specific Comment #2 above regarding attachments.	<p>The NFA concurrence letters has been provided as PDF files on a CD within the Draft Final FOST.</p> <p>Attachments for DoD policy regarding lead, asbestos, and radon and response to comments has been included in the Draft Final FOST.</p>
19.	Section 4.1 (Area Types), Page 4-1, Paragraph 2.	This paragraph refers to a "2002 EBS", however, there is no reference to it in Section 9 (References). Please reconcile. "VSI" is used for the first time in the document and it should be spelled out. It is stated that PRLs are not considered LOCs pending conclusions of further evaluation, however, in the majority of the document they are referred to as LOCs. Please reconcile.	Text has been corrected in accordance with comments.
20.	Section 4.1.1 (PRL), page 4-1,	Says two Potential Release Locations associated with petroleum products require further investigation but are nevertheless suitable for transfer. The basis for this conclusion should be described. If the property contains hazardous substances, the property would not be suitable for transfer under CERCLA section 120(h)(3)(A)(ii). If site investigation is not yet complete, the possibility that hazardous substances are present may exist.	PRLs and other petroleum sites that require further evaluation or remediation have been removed from the FOST and have been incorporated into the FOST.
21.	Section 4.1.2 (Hazardous Substance LOCs), Page 4-1.	The first sentence states that all 104 hazardous substance LOCs have received regulatory concurrence for NFA. According to the tables, this is not an accurate statement. Please reconcile. Table 5 (TAA sites) does not match the number of sites listed in this paragraph. Please correct the inconsistency.	Text has been revised to correct discrepancy.
22.	Section 4.1.3 (IRP LOCs), Pages 4-1 through 4-6.	<p>Please include IRP Site 4 on Figure 6.</p> <p>For each IRP site, the land use assumptions for any NFA or other decision, as well as any use conditions such as industrial use only or limitations on excavation, should be described. If there is no ROD or other decision document for an IRP site, the site is not suitable for transfer under CERCLA section 120(h)(3)(A)(ii). The FOST should verify that each ROD cited in this section is a part of the Administrative Record.</p>	<p>IRP Site 4 is within Carve-out II-E and is shown in Attachment 6 of the FOST and Figure 5a of the FOST.</p> <p>All IRPs in the FOST have an NFA ROD. These decisions were based on an assumption of residential reuse. All RODs are part of the administrative record.</p>



**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
		<p>Please include the ROD NFA documentation in Attachment 1.</p> <p>IRP Site 24 (Section 4.1.3.6) – This section is very confusing. It is not clear what portion of IRP Site 24 the Navy plans to transfer. The justification, for whatever portion is proposed for transfer, must also be clearly presented. It is unclear from the text and Figure 6 whether or not groundwater contamination is underlying the portion proposed for transfer. (Please also refer to General Comment #14 above.) Additionally, it sounds like there was a ROD completed, which includes the shallow groundwater unit. In looking at the groundwater plumes on Figure 4-5 (Draft Final EBS), it would appear that Transfer Parcels I-A, II-A and III-A may be impacted by the buffer zone around IRP Site 24 (shallow groundwater unit). Please ensure that the property proposed for transfer is not within the buffer zone, as outlined in the ROD. This also applies to IRP Site 16, which is shown in the FOSL as carve-out I-F. There is a groundwater plume associated with the site. The FOSL states that a Draft ROD is currently being reviewed by the regulatory agencies. Please ensure there is an adequate buffer zone in place for IRP Site 16 and that the buffer zone is not included in the property proposed for transfer.</p>	<p>The discussion of IRP Site 24 (both Vadose Zone and SGU) has been revised and is presented in the FOSL. Appropriate buffer zones have been included in the carve-outs for IRP Site 16 and 24 as stated in their respective RODs.</p> <p>NFA concurrence letters has been provided as PDF files on a CD within the Draft Final FOST.</p>
23.	Section 4.1.4 (AST/UST LOCs), Page 4-6.	<p>Please reference Table 7. The total number of USTs/ASTs listed here does not match the number in Table 7. The number of USTs listed here does not match the number in Table 7. This paragraph states that all ASTs have received regulatory concurrence for NFA, however, the notes in Table 7 for AST 376 state that further investigation is recommended to determine whether releases of petroleum products have occurred from the tank. Please reconcile all of these issues.</p>	Table 7 and associated text have been reviewed and corrected.

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

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Comment No.	Section/ Page No.	Comment	Response
24.	Section 4.1.5 (Wastewater Treatment and Related System LOCs), Page 4-6.	Please reference Tables 8 and 9. This paragraph refers to two figures (8a and 8b), but there is also a Figure 8c in this FOST. Please correct. The number of OWSs listed here does not match the number in Table 8. There is also a septic tank system (RFA 305) shown on Figure 8c, but not shown on the tables and not accounted for in this paragraph. Please reconcile.	The text, figures and tables have been cross-checked and corrected as appropriate.
25.	Section 4.1.6 (PCB-Containing Transformer and Non-Transformer PCB Equipment LOCs, Page 4-6.	Please reference Tables 10 and 11.	Reference to appropriate tables has been added.
26.	Section 4.1.7 (Miscellaneous LOCs), Page 4-7.	Please reference Table 12.	Reference to appropriate tables has been added.
27.	Section 4.2 (Environmental Concerns Within Parcels Suitable For Transfer), Page 4-7.	This section basically contains the same information that's presented in Section 4.1 except that it's organized by parcel rather than LOCs. It seems the only new information is regarding PCBs, which more appropriately should be placed in Section 5 (Notifications and Restrictions). The opening paragraph for this section is confusing and doesn't provide a good description of the information presented in this section. Please re-work. Also, it would be helpful to state how many buildings/structures are in each parcel and whether they are slated for reuse or demolition.	The opening paragraph in Section 4.2 has been reworded for clarity.  Information regarding buildings/structures in each parcel has been added. The future reuse or demolition of the facilities is not known at this time; therefore, this information cannot be incorporated.
28.	Section 4.2.1.1 (PRL LOCs in Parcel I-A), Page 4-7.	The first sentence incorrectly states "Parcel A-1" and it should be "Parcel I-A". Please make the change.	These PRLs were included in the Draft FOST because of their potential petroleum impact and requiring further evaluation. These PRLs are no longer addressed in the Draft Final FOST and are addressed in the Draft Final FOSL, therefore this section has been deleted.

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

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Comment No.	Section/ Page No.	Comment	Response
29.	Section 4.2.1.4 (AST/UST LOCs in Parcel I-A), Page 4-7.	The total number of USTs listed here does not match the number in Table 7. Please reconcile.	The number of USTs has been corrected.
30.	Section 4.2.1.5 (Wastewater Treatment and Related System LOCs in Parcel I-A), Page 4-8.	There is also a Septic Tank System (RFA 305) that is not shown on Tables 8 and 9, but is shown on Figure 8c as being in Parcel I-A. Please reconcile.	Text has been added regarding the septic tank.
31.	Section 4.2.2.2 (Hazardous Substance LOCs in Parcel II-A), Page 4-8.	The number of RFA sites listed here does not match the number in Table 4. Please correct the inconsistency.	The number of RFA sites has been corrected.
32.	Section 4.2.2.4 (AST/UST LOCs in Parcel II-A), Page 4-9.	The number of USTs listed here does not match the number in Table 7 (under header II-A). Please reconcile.	The number of USTs has been corrected.
33.	Section 4.2.2.5 (Wastewater Treatment and Related System LOCs in Parcel II-A), Page 4-9.	The number of OWSs listed here does not match the number in Table 8. Please correct the inconsistency.	The number of OWSs has been corrected.
34.	Section 4.2.2.6 (PCB-Containing Transformers	The second sentence states that all PCB-containing transformers containing concentrations of PCBs of 50 ppm or greater have been removed or replaced with non-PCB transformers. According to Table 10, this is not an accurate	Text has been revised to account for PCB T075. PCB T109 is within carve-out II-Q and is addressed in the FOSTL.

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Comment No.	Section/ Page No.	Comment	Response
	and Equipment in Parcel II-A), Page 4-9.	statement (PCB T075 and possibly PCB T109). Please reconcile.	
35.	Section 4.2.3.1 (Hazardous Substance LOCs in Parcel III-A), Page 4-9.	The number of TAA sites listed here does not match the number on Table 5. Please correct the inconsistency.	The number of TAA sites has been corrected.
36.	Section 4.2.5.1 (Hazardous Substance LOCs in Parcel V-A), Page 4-10.	The number of APHO sites listed here does not match the number in Table 6. Please correct the inconsistency.	The number of APHO sites has been corrected.
37.	Section 4.2.5.2 (AST/UST LOCs in Parcel V-A), Page 4-10.	The number of USTs listed here does not match the number in Table 7 (under heading Parcel V-A). Please correct the inconsistency.	The number of USTs has been corrected.
38.	Section 4.2.5.3 (PCB-Containing Transformers and Equipment in Parcel V-A), Page 4-10.	If the following sentence applies, please insert into this paragraph: "All PCB-containing transformers containing concentrations of PCBs of 50 ppm or greater have been removed or replaced with non-PCB transformers." This sentence was included in Sections 4.2.3.4, 4.2.2.6 and 4.2.1.6, but for some reason was not included in this section.	The provided text has been added.
39.	Section 5 (Notifications and Restrictions), Page 5-1.	This section says that restrictions discussed in the FOST will be incorporated into the deeds of affected properties. The FOST should include a list of properties with restrictions, the basis for determining that the particular restrictions are protective of human health and the environment and a reference to the document in which this determination is made. Note that DTSC's land use	Formerly, restrictions in the FOST included petroleum sites. These further action petroleum sites are now in the FOST and no petroleum-related restrictions are in the FOST. All property is suitable for residential reuse. The only restrictions in the FOST include ACM and LBP restrictions, which will appropriately be addressed in the deeds. Table 15 of the FOST summarizes all notifications and restrictions.

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

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Comment No.	Section/ Page No.	Comment	Response
		<p>covenant regulation at California Code of Regulations, title 22, section 67391.1, effective April 19, 2003, requires recordation of a covenant if hazardous substances remain above levels suitable for unrestricted use. If restrictions on a property were required in a prior response action decision document but a land use covenant was not required, those restrictions should be reviewed to determine whether the decision document should be amended to include a requirement for recordation of a land use covenant.</p> <p>Restrictions and notifications must be included in the deeds of affected properties within the FOST areas.</p> <p>Was a radon survey ever conducted at Former MCAS El Toro?</p>	A radon survey was conducted for MCAS El Toro and is summarized in the EBS and will also be summarized in Section 5 of the FOST.
40.	Section 5.1 (Potential Release Locations), Page 5-1, <u>Restrictions</u> .	The restriction states, "The transferee shall not conduct any subsurface excavation, digging, drilling, or other disturbance of the surface within the vicinity of the following PRLs..." To simply state "within the vicinity" is not adequate. In order for the restriction to be enforceable, there must be a legal description of the property boundaries affected by this restriction. These PRLs are included in the property proposed for transfer, yet according to this restriction the DON is maintaining responsibility for cleanup and closure. The DON and regulatory agencies will need to have a right of access to the property and some type of agreement to enforce the restrictions in the deed. The DON must also retain the ability to conduct the cleanup.	PRLs with possible petroleum contamination were included in the Draft FOST along with other further action petroleum sites that were planned for transfer. However, active petroleum sites/PRLs are no longer addressed in the Draft Final FOST and are addressed in the Draft Final FOSL. Therefore, DoN will be retaining responsibility to complete action at these sites.
41.	Section 5.2 (Hazardous Substances), Pages 5-1 and 5-2.	To be more accurate, please change the heading from "Hazardous Substances" to "Hazardous Substances and Petroleum Products". Please make the same change throughout the paragraph. Please change "hazardous material and waste" to "hazardous substances". <u>Restrictions</u> – Please change "storage, release, or disposal of hazardous substances or petroleum products" to "hazardous substance LOCs". Also, there should be a justification for why there are no restrictions (i.e., regulatory concurrence for NFA).	The text has been revised as indicated.

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
42.	Section 5.3 (Installation Restoration Program Sites), Page 5-2.	Please see earlier comments regarding IRP Site 24. Please list the concentrations of PCBs in soil.	See responses above regarding IRP Site 24.  Concentrations of PCBs in soil have been added.
43.	Section 5.4 (USTs/ASTs), Page 5-2.	<p><u>Notifications</u> - The number of UST/AST sites presented here does not match the number in Table 7.</p> <p>Please change the third sentence to read, "Of these, 26 USTs that stored petroleum products either require completion of response actions or further investigation."</p> <p>This paragraph should also mention the Petroleum Products Notification Table (Attachment 2).</p> <p>Because the RWQCB uses other than risk-based cleanup standards to make its NFA determinations for UST/AST sites, DTSC would like a notification in the deed to inform future land owners of the cleanup criteria used at these sites. Please incorporate a new paragraph in this section as follows: "UST sites have been cleaned up in Parcels I-A, II-A, and III-A. ASTs have been cleaned up in Parcels I-A and II-A. These UST and AST sites were cleaned up according to standards promulgated by the RWQCB. The RWQCB uses water protection standards as its guidelines, in order to protect the quality of surface and subsurface waters. These standards do not include a risk-based approach to cleanup and therefore on a case by case basis may not be as protective of human health and the environment as a risk-based approach to cleanup may be. As a result of the standards utilized in the cleanup at these UST/AST sites, hazardous substances contained in petroleum products may have been left at the sites at levels that are not protective of human health."</p> <p>UST sites were also cleaned up in Parcel V-A, however, according to Table 7 they were given NFA concurrence by the OCHCA, not the RWQCB. Many other tank sites in Parcels I-A, II-A and III-A were closed out by the OCHCA, but until DTSC has a better understanding regarding the</p>	<p>The number of USTs has been corrected.</p> <p>Petroleum USTs requiring further evaluation have been removed from the Draft Final FOST and are discussed in the Draft Final FOST.</p> <p>Reference to the Petroleum Products Notification Table has been added.</p> <p>The UST and AST sites in question were closed using appropriate procedures and the Navy has concurred with DTSC that no UST or AST sites that have received prior NFA concurrence from the RWQCB and/or OCHCA should be re-opened. Consequently, the Navy cannot incorporate the requested text. No changes have been made to the FOST in response to this portion of the comment. Please also refer to the response to General Comment #10.</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

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Comment No.	Section/ Page No.	Comment	Response
		<p>cleanup standards used by the OCHCA (See Specific Comment #75 below), we cannot include them in this comment.</p> <p><u>Restrictions</u> - The restriction states, "The transferee shall not conduct any subsurface excavation, digging, drilling, or other disturbance of the surface within the vicinity of the following UST locations..." To simply state "within the vicinity" is not adequate. In order for the restriction to be enforceable, there must be a legal description of the property boundaries affected by this restriction. These USTs are included in the property proposed for transfer, yet according to this restriction the DON is maintaining responsibility for cleanup and closure. The DON and regulatory agencies will need to have a right of access to the property and some type of agreement to enforce the restrictions in the deed. The DON must also retain the ability to conduct the cleanup.</p> <p>The last sentence should provide justification for why there are no restrictions for the remaining UST/AST sites (i.e., NFA concurrence from regulators).</p>	<p>Since petroleum FA sites have been moved to the FOSL, no petroleum-related restrictions will be in the FOST.</p> <p>Text has been added to justify why there are no restriction for UST/AST sites.</p>
44.	Section 5.5 (Wastewater Treatment and Related Systems), Page 5-3.	<p><u>Notifications</u> - There is also a septic tank system and a Figure 8c. Please correct.</p> <p><u>Restrictions</u> - Please provide justification for why there are no restrictions for the wastewater treatment and related system LOCs (i.e., NFA concurrence from regulators)</p>	Text has been revised to clarify discrepancies.
45.	Section 5.6 (Polychlorinated Biphenyls), Page 5-3.	<p><u>PCB-Containing Transformers and PCB-Containing Transformer/Equipment Storage Areas</u> - The information presented in the first two paragraphs is not completely consistent with the information presented in Table 10. Please reconcile.</p> <p><u>Non-Transformer PCB Equipment</u> - When was the survey conducted?</p> <p><u>PCB Light Fixtures</u> - In paragraph 2, please cite reference for DON guidance.</p>	<p>Text has been revised/added as appropriate to clarify discrepancies.</p> <p>The survey date has been added.</p> <p>Citation for DoN guidance has been added.</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

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Comment No.	Section/ Page No.	Comment	Response
46.	Section 5.7 (Medical/Biohazardous Waste), <u>Notifications</u> , Page 5-4.	Please cite reference.	Reference has been added.
47.	Section 5.8 (Ordnance), Page 5-4.	<p><u>Notifications</u> – Buildings 136 and 173 are listed here but are not included in Table 1. Also, Building 354 (Former Skeet Range) is listed in Table 1 as being in Parcel IIA, but is not listed in this section. Are there any other former skeet ranges or pistol/rifle ranges that have not been listed here? Please reconcile and provide more justification as to why the Navy believes that ordnance and/or explosive hazards do not remain on the property. Please cite reference(s).</p> <p>Section 4.1.8 of the EBS states that, "Phase II inspections have not been completed. However, the 2002 EBS VSIs included these facilities and noted to be in good condition and clear of explosives and/or hazardous waste or material." Does the Navy plan to complete the Phase II inspections, or were the 2002 EBS VSIs conducted in lieu of the Phase II inspections? Were all 7 identified ranges transferred to federal entities? Where were the ranges located? (Comment provided 9/12/03)</p>	<p>Text has been added as appropriate to clarify discrepancies. Section 4.1.8 of the EBS provides more detailed information for ordnance sites and previous inspections performed.</p> <p>The 2002 VSIs are intended to complete planned Phase II inspections. Section 4.1.8 of the EBS assigns ECP categories based on the results of the 2002 VSI's and previous investigations.</p> <p>The following sites are on current MCAS El Toro property, and not on FAA transfer property: Bore Sighting Range/Pistol Range, Building 235 (located 700 feet to the east/northeast of Tank Farm Number 5), Skeet Range, Building 236 (located at the east end of the golf course practice fairway), Skeet Range, Building 354 (located east of North 3rd street at DRMO Yard #3), NBC Gas Chamber, Building 832 (located in the stables area)</p> <p>The following sites are on the FAA/FBI transfer property: EOD Range (Site 1), Pistol Range (located 1/4 mile south of the gate leading into the ordnance storage area, on west side of Magazine Road)</p> <p>The following site is located off MCAS El Toro property (and is being dealt with as a FUDS site): Irvine National Guard Rifle Range (located one mile northeast of northern most point of MCAS El Toro)</p> <p>This information was referenced from the Army Corps Prelim Range Evaluation Report. Please note that the Ranges at Buildings 235 and 236 are to be investigated as PRLs based on Post-VSI evaluation; however, the Ranges at Buildings 354 and 832 were recommended for no further investigation based on the post-VSI evaluation.</p>



**Document Title:**

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Comment No.	Section/ Page No.	Comment	Response
48.	Section 5.9 (Pesticides), Pages 5-4 and 5-5.	<u>Notifications</u> – In paragraph 2, sentence 1, please include number of acres and explain how long the areas have been used for agricultural purposes. Please cite references for the VSIs, EBS and the 1994 and 2002 sampling that was conducted in the agricultural lease areas.	Text has been added as indicated.
49.	Section 5.10 (Miscellaneous Locations of Concern), <u>Restrictions</u> , Page 5-6.	<p>The restriction states, "The transferee shall not conduct any subsurface excavation, digging, drilling, or other disturbance of the surface within the vicinity of MSC JP5 within Parcel II-A..." To simply state "within the vicinity" is not adequate. In order for the restriction to be enforceable, there must be a legal description of the property boundaries affected by this restriction. This Miscellaneous LOC is included in the property proposed for transfer, yet according to this restriction the DON is maintaining responsibility for cleanup and closure. The DON and regulatory agencies will need to have a right of access to the property and some type of agreement to enforce the restrictions in the deed. The DON must also retain the ability to conduct the cleanup.</p> <p>The last sentence should provide justification for why there are no restrictions for the remaining Miscellaneous LOCs (i.e., NFA concurrence from regulators).</p>	<p>There are no longer any further action miscellaneous LOCs addressed in the Draft Final FOST. They are now included in the Draft Final FOSL.</p> <p>Reference to NFA concurrence has been added.</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

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Comment No.	Section/ Page No.	Comment	Response
50.	Section 5.11 (Asbestos-Containing Material (ACM)), Pages 5-6 through 5-9.	<p>Please include a figure showing the decision tree for asbestos-containing material surveys. Please refer to MCAS Tustin's FOST 3 (Transfer Parcels 23, 29, 34, 35 and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41), Figure 11 for an example.</p> <p><u>Paragraph 1</u> – Please cite the reference for the DOD policy discussed here.</p> <p><u>Paragraph 3</u> – Please explain when, according to DON Policy, DON is required to conduct a FAD ACM survey. This paragraph only discusses when a FAD ACM survey is not required.</p> <p><u>Paragraph 6</u> – The ACM surveys that DON is currently updating should be included in the Final FOST.</p> <p><u>Notifications</u> – Please cite the references for the survey reports listed here and include in Section 9 (References).</p> <p><u>Restrictions</u> – Are all the facilities within the parcels suitable for transfer included in one of the four categories listed?</p> <p><u>Facilities Requiring an ACM Survey</u> – Are any of the buildings listed here slated for reuse? If so, why isn't the Navy conducting surveys at these facilities? Many of the buildings/structures listed here are not included in Table 14. Please reconcile. Surveys for the Wherry Housing structures that are currently being updated should be included in the Final FOST.</p> <p><u>Facilities With Non-FAD ACM</u> – Bldg. 5105 is listed here, but is not included in Table 14. The title of the housing area does not match the title on Table 14. Please reconcile.</p> <p><u>Facilities With No ACM</u> – The information presented here is not consistent with Table 14. Please reconcile.</p>	<p>An ACM survey decision tree has been added to the FOST.</p> <p>A reference to the DoD asbestos policy from the Base Reuse Implementation Manual has been cited.</p> <p>As a general matter, DoN will perform asbestos surveys when a structure is scheduled for reuse, or if its status is To Be Determined. For structures at MCAS El Toro, DoN anticipates all or nearly all such structures will be demolished by the transferee(s). Therefore, rather than perform new surveys for all structures, use or occupancy of structures for which DoN would otherwise perform new surveys will be restricted pending (1) performance of asbestos surveys and any necessary abatement, or (2) demolition by transferee(s). This paragraph was added to Section 5.11.</p> <p>Surveys were recently completed for Wherry housing that potentially may be reused. This information has been included in the Draft Final FOST. References for the survey reports has been added.</p> <p>All structures within the transfer parcels are listed in one of the ACM categories.</p> <p>A portion of Wherry housing and Building 834, 322 and part of the stables area are the only structures listed in this section that are projected for potential reuse, and all have had a recent ACM survey. This survey information will be included in the Final FOST. Please also see response to "paragraph 3" portion of this comment above.</p> <p>Information has been reconciled.</p> <p>Information has been reconciled. Please note that facilities that are listed as requiring an ACM survey were not included in Table 14 if no survey had previously been done, since Table 14 summarized results of ACM surveys. A note has been added to the table to indicate that buildings/facilities on FOST property that are not listed in the table have not been previously surveyed.</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
51.	Section 5.12 (Lead-Based Paint), Pages 5-9 through 5-13.	<p>Does the Navy consider any of the facilities listed in Table 1, aside from Saddleback Terrace senior officers quarters, Saddleback Terrace, Saddleback Terrace II senior officers quarters, Vista Terrace, NAMAR, Wherry, and San Joaquin, as "target housing"? If so, were they surveyed according to DON policy? For instance, Bldg. 656 (Child Development Center) was built in 1971. Was this building surveyed?</p> <p><u>Residential Structures</u> - Line 2 - Please change "Property (1999)" to "Property - A Field Guide (DOD/EPA 1999)". In paragraph 3, shouldn't "1960" be changed to "1978"?</p> <p>In paragraph 4, the LBP evaluations currently being updated should be included in the Final FOST. The last paragraph seems to be inconsistent with DON policy regarding "target housing". It also is inconsistent with the restrictions listed on page 5-12. Please reconcile. Were all pre-1978 residential structures/target housing evaluated/surveyed as outlined in DON policy?</p> <p><u>Notifications</u> - In the first paragraph, please explain why all the pre-1978 housing areas/target housing weren't surveyed. In paragraph 5, please insert the following sentence prior to sentence 4, "Therefore there is a possibility that, through the normal weathering, lead from LBP is present in the soil surrounding these structures." Paragraphs 6, 7 and 8 should be included as restrictions. In paragraph 7, shouldn't "target housing" be changed to "non-target housing"?</p> <p><u>Restrictions</u> - Restrictions for non-residential structures must be included here.</p> <p>For consistency, please ensure that the housing structures are identified in Table 1 as they are referred to on page 5-11. It would also be helpful to know which buildings/structures are slated for demolition and which are slated for reuse. At a minimum, please include this information in Table 1.</p>	<p>Building 656 is not projected for potential reuse as a child-care center and thus is not treated as target housing or a child occupied facility. Building 834 is also designated for potential transfer for use as a child-care facility; however, Building 834 was constructed in 1988, and therefore an LBP evaluation is not required for this structure. This information has been included in the FOST and EBS. There is no other target housing, as defined by the 1999 Field Guide, at El Toro other than the target housing referenced in the comment.</p> <p>Text referring to the EPA-DoD Field Guide has been edited as noted. 1960 is the correct date, per the requirements of Title X, its implementing regulations, and the Field Guide. However, with certain exceptions, the Navy will be requiring demolition of all 1960-1978 target housing as a condition of sale. The Navy will not update LBP assessments for San Joaquin housing structures or require demolition of these structures as a condition of sale, because these structures do not contain LBP. The Navy has updated its LBP assessment for 168 Wherry housing structures to prepare for their potential reuse; however, in the event these structures will not ultimately be utilized, the Navy will require demolition of these structures as a condition of sale.</p> <p>The Dept of the Navy anticipates that any transferee(s) will wish to demolish all or nearly all structures on the parcels suitable for transfer, and has approached the issue of updating LBP assessments on the basis of this expectation. Under 24 CFR 35.115, assessment requirements do not apply to structures that are to be demolished. Consequently, DoN has decided to require demolition of target housing which would otherwise require an updated LBP assessment as a condition of sale. LBP evaluations have been updated for target housing structures that potentially may be reused. DoN respectfully contends that this decision is in accordance with applicable law and policy. Information regarding the disposition of residential structures has been included in the FOST.</p> <p>While all target housing has been surveyed for LBP previously, the Navy is not updating these previous LBP evaluations for structures that the transferee(s) will be required to demolish as a condition of sale. Additionally, the FOST has been revised to include equivalent language concerning weathering in the Notifications section, as follows: "The age of many of the structures on the property suitable for transfer suggests the likelihood that lead-based paint may be present on some of these structures. This in turn creates the possibility that, through the action of</p>

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(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

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Comment No.	Section/ Page No.	Comment	Response
			<p>normal weathering and maintenance, there may be lead from lead-based paint in the soil surrounding these structures. Please see above response to portion of comment concerning consistency with target housing policy. Paragraphs 6, 7, and 8 has been moved to the Restrictions discussion. "Target housing" in paragraph 7 is correct, per the EPA-DoD Field guide. Restrictions for non-residential structures in regard to LBP has been included in the FOST.</p> <p>Table 1 and page 5-11 have been made consistent. All residential structures are projected for demolition except a portion of Wherry housing, Buildings 319, 322, 360, 834 and part of the equestrian center, which are all projected for reuse, and San Joaquin housing.</p>
52.	In Section 5.12 (Lead-Based Paint), <u>Notifications</u> , page 5-12.	<p>DON maintains that the property suitable for transfer contains buildings and structures that were built prior to 1978 and may contain lead-based paint. While the DON does not specifically list the pre-1978 buildings and structures in this section, it does refer the reader to Table 1, which DON says provides a list of all buildings and structures within the parcels suitable for transfer and their corresponding dates of construction. However, Section 5.12 (Lead-Based Paint), <u>Nonresidential Structures</u>, page 5-10 states that DON will not conduct LBP evaluations at non-residential buildings prior to transfer.</p> <p>The United States Environmental Protection Agency (EPA) and DTSC consider the presence of exterior LBP that has been released to the soil, to pose a potential Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) release to the environment. DON is required to evaluate and address all releases of CERCLA hazardous substances at its facilities, and where property has been transferred under CERCLA 120(h)(3) the DON must covenant that it will perform any remedial action found to be necessary after the date of transfer. In addition, the "DoD policy on Responsibility for Additional Environmental Cleanup after Transfer of Real Property" (DoD comeback policy) asserts that DoD will typically utilize the Local Redevelopment Authority's reuse plan as a basis for the land use assumptions that DoD will consider during</p>	<p>DoN recognizes that USEPA and DTSC consider the presence of exterior LBP that has been released to the soil to pose a potential CERCLA release to the environment. However, the USEPA and DoD previously "agreed to disagree" on the question of natural weathering being a release of a CERCLA hazardous substance during negotiations for the joint USEPA/DoD Field Guide. DoD deliberately avoided expressly endorsing or agreeing with the USEPA's position in the Field Guide. The Field Guide also states that "although EPA concluded that the release of lead to soil from lead-based paint from structures falls within the CERCLA definition of a hazardous substances release, EPA and DoD agree that for the majority of situations involving target housing (and child-occupied facilities), Title X is sufficiently protective to address hazards posed by lead-based paint.</p> <p>The CERCLA liability to evaluate and abate any LBP release/hazards does not apply to DoN since DoN does not consider the release of LBP by weathering to be a CERCLA release. The CERCLA warranty for LBP cleanup costs after transfer is not applicable based on the DoN's position for releases of LBP through weathering. Any evaluation and abatement of soil-lead hazards at MCAS El Toro for nonresidential buildings and structures will be the responsibility of the future transferee unless DoD policy or generally applicable standards for nonresidential buildings/structures are promulgated after transfer.</p> <p>The Navy understands this is a standing "Unresolved Comment" and it will be attached to this FOST per the BRIM guidelines. This response is consistent with the response provided to similar comments in the FOSTs for Tustin.</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
		<p>a remedy selection process. Because of the age of the buildings/structures, a potential release to the environment of lead associated with exterior lead-based paint exists, DON should conduct soil sampling to determine whether soils surrounding the pre-1978 buildings/structures (that have not already been evaluated and received regulatory concurrence) contain lead from LBP at levels which may pose a threat to human health and the environment.</p> <p>DTSC understands that the DON looks to Title X, the Residential Lead-Based Paint Hazard Reduction Act and the joint DoD/U.S. EPA interim final "Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property – A Field Guide" (December 1999) to address the hazards posed by LBP. DTSC however, has not adopted the joint DoD/U.S. EPA guidelines and its criteria for evaluating LBP hazards. DTSC maintains that lead from LBP is a CERCLA release. Therefore, without site-specific data, DTSC is unable to determine whether, pursuant to CERCLA 120(h)(3), all remedial actions have been taken at Parcel I-A, II-A, III-A, IV-A and V-A. with respect to potential releases of lead from LBP.</p>	
53.	Section 5 (Notifications and Restrictions), Pages 5-1 through 5-13.	<p>Please include the following notification in this section (a new sub-section will need to be created):</p> <p>"School Site Considerations – Parcels (Navy, please fill in with the appropriate parcel numbers) have been proposed in the (Navy, please fill in with the appropriate reference [i.e., Reuse Plan]) for educational use after transfer. Should the subject parcel(s) be considered for the proposed acquisition and/or construction of school properties utilizing state funding, a separate environmental review process in compliance with the California Education Code section 17210 et. seq. will need to be conducted by the transferee and approved by the DTSC (School Property Evaluation and Cleanup Division). The California Education Code requires that a comprehensive evaluation of natural and</p>	<p>The following language (modified from DTSC's proposed text) has been added to Notifications section of the FOST:</p> <p>"School Site Considerations – If, subsequent to transfer, any portion of the property found suitable for transfer by this FOST is considered for the proposed acquisition and/or construction of school properties utilizing state funding, a separate environmental review process in compliance with the California Education Code section 17210 et. seq. will need to be conducted by the transferee and approved by the DTSC (School Property Evaluation and Cleanup Division). The California Education Code requires that a comprehensive evaluation of natural and manmade hazardous materials be conducted for school properties. This comprehensive evaluation requires additional investigation of hazardous materials outside the scope of CERCLA hazardous substances. This additional evaluation includes: legally applied pesticides and herbicides, imported fill materials, naturally</p>

## Document Title:

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
		manmade hazardous materials be conducted for school properties. This comprehensive evaluation requires additional investigation of hazardous materials outside the scope of CERCLA hazardous substances. This additional evaluation includes: legally applied pesticides and herbicides, imported fill materials, naturally occurring hazardous substances such as heavy metals (e.g., chromium, mercury, nickel), metalloids (e.g., arsenic, selenium), gases (e.g., methane, hydrogen sulfide), and radioactive elements (e.g., radon gas) and naturally occurring petroleum deposits. The evaluation also includes asbestos-containing materials and lead-based paint at concentrations that fall outside the scope of CERCLA."	occurring hazardous substances such as heavy metals (e.g., chromium, mercury, nickel), metalloids (e.g., arsenic, selenium), gases (e.g., methane, hydrogen sulfide), and radioactive elements (e.g., radon gas) and naturally occurring petroleum deposits. The evaluation also includes asbestos-containing materials and lead-based paint at concentrations that fall outside the scope of CERCLA. Any requirements associated with the evaluation of any property for compliance with the California Education Code are the sole responsibility of the transferee."  Please also refer to response to General Comment #6.
54.	Section 5 (Notifications and Restrictions), Pages 5-1 through 5-13.	Please include a notification for wells. Figures 11a through 11d show well locations throughout the property proposed for transfer, but there is no discussion regarding the well locations in the text or tables of the FOST. Please refer to MCAS Tustin's FOST 3 (Transfer Parcels 23, 29, 34, 35 and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41), Section 8.10 for sample notification language.	Monitoring wells that remain in use will not be included in the FOST. All such active monitoring wells are included in the FOST.
55.	Section 7 (Right of Access and Covenant-Additional Remedial Action), Page 7-1.	This section describes the requirements of CERCLA section 120(h) regarding covenants in the deeds of transferred property. Note that if a land use covenant is determined to be required for any of the El Toro property, restrictions and access provisions paralleling those in the deed would be included in the land use covenant.  Please include right of access language for groundwater monitoring wells and/or surface water gauging locations. Please refer to MCAS Tustin's FOST 3 (Transfer Parcels 23, 29, 34, 35 and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41), Section 8.12 for sample language.  In paragraph 2, the CERCLA section cited, "120(h)(3)(A)(ii)(II)" should be changed to "120(h)(3)(A)(ii)".	Comment noted.  No surface water gauging locations or still-active monitoring wells are in the revised FOST.  Citation has been revised.

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
56.	Section 8 (Conclusions/ Finding of Suitability to Transfer), Page 8-1.	Please refer to General Comment #4 above.	Please see response to General Comment #4 above.
57.	Section 9 (References), Page 9-1.	There are many references used throughout the document that are not included in this section and there are many references in this section that are not used in the document. Please thoroughly review this section and make all the appropriate corrections. Also, The page numbering is incorrect.	References have been reviewed and revised as appropriate.
58.	Figure 2, Carve-Outs Proposed for Transfer.	The title for this figure in the Table of Contents is more appropriately listed as "Parcels Proposed for Transfer". Please make the appropriate change. What is the difference between a "Transfer Parcel Number" and a "Navy Sale Parcel Number"?	<p>The title of the figure has been corrected to be "Parcels" Proposed for Transfer.</p> <p>Transfer Parcel Number is I-A, II-A etc. that are portions of Navy Sale Parcels I, II, etc.</p> <p>Please note that the FOSL refers to the areas to be leased as "carve-outs".</p>
59.	Figure 3a, Facilities Within Transferable Parcels.	All housing areas should be labeled. There are a lot of yellow areas indicating a building/facility that are not identified by a building/facility. Please explain. There are numerous buildings/facilities shown on the figure that are not included on Table 1. Please explain.	<p>Housing areas have been labeled on Figure 3. A review of unlabeled structures was done, and buildings that are not labeled will have their building number or name added if it is known. There are numerous small structures, such as sheds, stable area structures, windsocks, etc. that do not have numbers and therefore were not labeled.</p> <p>A note has been added regarding buildings shown in Figure 3 but not listed in Table 1.</p>
60.	Figure 3b, Transferable/L ease Areas and City of Irvine Proposed Reuse Designations	This figure should be consistent with the City of Irvine's Final EIR, Great Park Overlay Plan. The source should be listed as such and the reference should be included in Section 9. Currently, there are inconsistencies between Figure 3b and the figures located on the website source listed, as well as, inconsistencies between Figure 3b and the Great Park Overlay Plan in the EIR.	Figure 3b reflected the latest City of Irvine reuse plan. However, Figure 3b will not be part of the Draft Final FOST. Please refer to response to General Comment #4.
61.	Figure 4a, Potential Release Locations.	This figure shows four PRLs, none of which are included on the corresponding table (Table 3). There is one PRL listed for Parcel II-A on Table 3, however, it is not shown on this figure. Please make all the necessary corrections.	None of the areas affected by PRLs are suitable for transfer at this time, and therefore are being addressed by the FOSL. The PRL figures and table has been removed from the Draft Final FOST.

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
62.	Figures 5a, 5b, 5c and 5d, Hazardous Substance LOCs.	<p>The "Notes" discuss RFA 12, but the corresponding Table 4 does not contain RFA 12. Please explain and make the necessary corrections. The "Notes" discuss RFA 12 and RFA 247, but they are not shown in the figures, why? Are figures available in the EBS?</p> <p>Figure 5a shows RFA 044 in Parcel II-A, but the corresponding Table 4 lists RFA 44 in Parcel I-A. Which is correct? Please make the appropriate change. This figure also makes it look like RFA 044 is in a non-transferable portion, although Table 4 has it listed as an ECP category 1. Please make the necessary corrections. Why are there two APHO 14 's shown on this figure?</p> <p>Figure 5b – why are there two APHO 12's on this figure?</p> <p>Figure 5d – why are there two APHO 16's on this figure?</p>	<p>RFA 12 and 247 are basewide sites (sanitary sewer and irrigation piping); therefore, these sites are included in the Figure 5 series within the "Notes" discussion. RFA 12 was omitted from Table 4 and has now been added to the RFA table. The sanitary sewer system is shown in the EBS in Figure 4-10.</p> <p>RFA 44 is in Carve-out II-D and has been moved to the FOSL. APHO 14 has been corrected.</p> <p>APHO 12 consists of two locations.</p> <p>APHO 16 has been corrected to show one location.</p>
63.	Figure 6, Installation Restoration Program Sites.	<p>The street names are illegible. Please correct.</p> <p>IRP Site 4 is missing from this figure. Please correct.</p> <p>Please show, on the figure, any groundwater plumes associated with the IRP sites.</p> <p>If all the IRP Sites have received NFA regulatory concurrence, then in the legend, please include "(NFA)" after "IRP Sites".</p> <p>It is difficult to tell what is IRP Site 7 versus IRP Site 24 (Vadose Zone). Please distinguish between the two.</p> <p>This figure does not include all IRP Sites. It only depicts the IRP Sites located in the transferable area. Please make this information clear to the reader.</p>	<p>Street names have been fixed.</p> <p>Site 4 is in Parcel II-E and is shown in the FOSL.</p> <p>Plumes fall within carve-outs shown in yellow. The FOST only shows those IRP sites that have been cleaned up and can be transferred.</p> <p>No Further Action has been added after "IRP Sites" in the legend.</p> <p>IRR Sites 7 and 24 are no longer in transferable property.</p> <p>Text has been added to clarify that only IRP sites within transferable areas are shown.</p>
64.	Figure 7a, 7b and 7c, AST and UST LOCs.	<p>According to Table 7, USTs 547, 548, 549, 550 and 551 are all inactive and should all have an "(I)" placed next to them on Figure 7a. Table 7 includes UST 392F, however, Figure 7a only shows 392A through 392E. Please correct the inconsistency. On Figure 7a there is a UST 610 and an AST 610, but they both point to the AST. Please have one pointing to the AST and one pointing to the UST.</p>	<p>USTs 547, 548, 549, 550 and 551 have been moved to the FOSL.</p> <p>UST 392F label has been added to Figure 7a.</p> <p>Leader line for UST 610 has been adjusted.</p>



**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
		<p>In the "Notes" for Figure 7b it states that ASTs 900-909 and AG1-AG11 are within the agricultural lease areas and that they are the responsibility of the lessee. Why is this information presented in the "Notes"? Are these ASTs and AG wells within the property proposed for transfer? Why aren't the ASTs and AG wells shown in the figure? The "Notes" for Figure 7b also state that AST 619B is situated at facilities leased by Orange County and that the tanks are the responsibility of the lessee. AST 619 is shown on the figure, but not AST 619B. Are they one in the same? Please explain. UST 463 is shown on Figure 7b, but it is not in Table 7. Please correct the inconsistency.</p> <p>In the "Notes" for Figure 7c it states that ASTs 910 and 911 and AG12-AG15 are within the agricultural lease areas and that they are the responsibility of the lessee. Why is this information presented in the "Notes"? Are these ASTs and AG wells within the property proposed for transfer? Why aren't the ASTs and AG wells shown in the figure? The "Notes" for Figure 7c also state that ASTs 519 and 839 are situated at facilities leased by Orange County and that the tanks are the responsibility of the lessee. Why is this information presented in the "Notes"? Are these ASTs within the property proposed for transfer? Why aren't they shown in the figure? Why are there two ASTs 883 shown on Figure 7c? One of them is pointing to an orange circle (AST) and the other isn't pointing toward a storage tank. Also, AST 883 is shown in Parcel I-A in Figure 7c, but shown in Parcel II-A in Table 7.</p> <p>Please make the necessary corrections. There is a green square (UST) shown on Figure 7c with no identification number. Please delete, or include the identification number. A number 241 is shown on Figure 7c in Parcel III-A, but the associated green square (UST) is missing. Please correct. AST 670 is listed in Table 7 as being in Parcel I- A, but it is not included in Figure 7c. Please correct the inconsistency. Figure 7c shows USTs 40, 41 and 42 in Parcel III-A, but Table 7 has them in Parcel I-A.</p>	<p>Information on the agricultural storage tanks (not wells) and the County storage tank are in the notes, since these tanks belong to the lessee and the tanks are not part of the transfer, even though they are on transferable property. These tanks are not shown on the figure since they are not DoN property. These ASTs were inspected during the VSI's in 2002 and no evidence of a release was noted. In addition, the lessees were subject to Orange County's 2002 Spill Prevention, Control and Countermeasure Plan that documented no known releases from these ASTs occurred. The lessees are required under their lease to obtain all necessary permits and abide by any applicable local and state laws and regulations in accordance with local fire department, RWQCB, and OCHCA requirements. Based on the VSIs and previous documentation, the Navy finds the property on which these tanks are located to be suitable for transfer.</p> <p>AST 619B should be AST 619; the note has been corrected. UST 463 has been reconciled.</p> <p>See notes above. AST 883 has been reconciled.</p> <p>Figure 7c has been corrected.</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

*Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003*

Comment No.	Section/ Page No.	Comment	Response
		Please correct the inconsistency. AST 146 should have an "(I)" by it for inactive, according to Table 7, and a line should be drawn from the identification number to the orange circle. Please make the corrections.	
65.	Figures 8a, 8b and 8c, Wastewater Treatment and Related System LOCs.	<p>The "Notes" incorrectly discuss underground storage tanks. Please correct.</p> <p>Figure 8c includes RFA 305, Septic Tank System, however, it is not discussed in the corresponding tables. Please make the necessary corrections.</p> <p>Figures 8b and 8c – in order to be consistent with Table 8, please include "OWS" before the oil/water separator ID numbers.</p>	<p>Note has been deleted.</p> <p>RFA 305 is included in Table 4.</p> <p>OWS has been added to the identifiers.</p>
66.	Figures 9b and 9c, PCB LOCs.	<p>On Figure 9b (top of the page), the Transfer Parcel Number is incorrectly listed as III-A and should be II-A. Please correct.</p> <p>Figure 9c shows PCB T135, T136, T137, and T141-T146, but they are not included in the corresponding Table 10. Please correct the inconsistencies.</p>	Figures have been corrected and inconsistencies with Table 10 have been corrected.
67.	Figures 10a and 10b, Miscellaneous LOCs.	Please include a similar "Note" as was done for the UST/AST LOCs. The "Note" would state that "All miscellaneous LOCs have been removed except for those noted as Inactive (I)." Please place an (I) by all MSC LOCs except for MSC W1 and MSC W2.	Figure 10a and 10b illustrate the location of MSC LOC sites; the "removed" status in Table 12 indicates that the water towers have been removed. A note regarding this has been added.
68.	Figures 11a through 11d, Well Locations.	These figures are included in the FOST, but there is no discussion regarding the well locations in the text or tables of the FOST. Please include information regarding the well locations in the text and tables. DTSC will not review the figures until the requested information is included.	Text has been added regarding the monitoring wells.
69.	Tables.	Please include a table for the wells. Figures 11a through 11d show well locations throughout the property proposed for transfer, but there is no discussion regarding the well locations in the text or tables of the FOST. Please refer to MCAS Tustin's FOST 3 (Transfer Parcels 23, 29, 34, 35 and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41), Table 8 for a sample well table.	Text has been added regarding the monitoring wells. There will be no active wells on FOST property. A table listing these wells has not been included. All wells within transferable property have been decommissioned or received approval for decommissioning by the regulators (4/29/03 and 5/6/03), except for well 16_UGMW33 that was not included in the original well closure request. However, well 16_MW3 will be used to similarly perform monitoring for Site 16. Well 16_UGMW33 will be recommended

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

*Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003*

Comment No.	Section/ Page No.	Comment	Response
			<p>for abandonment since it is no longer required for monitoring at Site 16.</p> <p>Currently active wells on property proposed for transfer will be decommissioned prior to transfer through a contract that has been awarded to decommission the wells no longer needed.</p>
70.	Table 1, Facilities within Parcels Proposed for Transfer.	<p>Please include the proposed disposition and ultimate parcel use of each facility listed in this table.</p> <p>There is a lot of information missing from the table (blank spaces). Please include the missing information, or if the information is unavailable or unknown, please state as such.</p> <p>It appears that NAMAR housing is listed out in individual units (Facility ID Numbers), while the Saddleback/Vista Housing, Saddleback Housing and Wherry Housing is not. Please explain and be consistent.</p> <p>San Joaquin housing is listed in Section 5.12, but it is not listed in this table. Please explain and make appropriate corrections.</p> <p>Why are the following Facility ID Numbers listed multiple times in the table: 5235, 5236, 5237 and 5238? Please make any necessary corrections.</p> <p>There are a number of facilities shown on Figure 3a that are absent from this table. Please ensure that Table 1 and Figure 3a are consistent.</p> <p>On page 16 of 16, please include all acronyms/abbreviations used in this table. Currently, there are a number missing.</p> <p>Please list the appropriate sources for this table and include them in Section 9 (References) of this FOST.</p>	<p>Specific reuse information is not available for these facilities (please see response to General Comment #4); therefore, TBD was added to the use column of the table.</p> <p>Missing information has been incorporated or "unknown" has been added.</p> <p>MAMAR housing has been revised and addressed as other housing areas.</p> <p>San Joaquin housing has been added.</p> <p>Duplicates have been corrected.</p> <p>Note has been added to Figure 3a.</p> <p>Acronyms and abbreviations have been checked.</p> <p>Source is the 2003 EBS and is found in the Reference Section.</p>
71.	Table 3, Potential Release Locations.	<p>Please list the appropriate sources for this table and include them in Section 9 (References) of this FOST.</p> <p>"Note a," at the bottom of the table refers to a 2002 EBS.</p>	<p>No PRLs are within transferable property. PRLs have been moved to the FOSL.</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

*Reviewer: Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. Dated: July 17, 2003*

Comment No.	Section/ Page No.	Comment	Response
		What 2002 EBS? There is no 2002 EBS listed in Section 9. Please explain.	The note has been edited to refer to the 2003 EBS.
72.	Table 4, RCRA Facility Assessment Sites.	<p>The "JEG1993" reference is not included in Section 9 and should be.</p> <p>The "NFA Letter/Agency/Date" is missing for RFA 44 and RFA 69. Please include in the table.</p> <p>RFA 147 is shown on the table, but is not included on the corresponding figure (5d). Please make the necessary corrections.</p> <p>In the "Notes" for RFA 1 and RFA 2 it states "...in support of this EBS." Does "this EBS" refer to the 2003 EBS that is nearing finalization? Please clarify. If so, why is the DTSC concurrence letter cited from 1996?</p> <p>In the "Notes" for RFA 2 it states "...only small amounts of waste were identified..." Yet, the ECP category listed is a 1. The "Notes" aren't consistent with the ECP category. Please correct.</p> <p>More information is needed in the "Notes" for RFA 46 and RFA 96 and the "Notes" should be consistent with the ECP category listed.</p> <p>Please list the appropriate sources for this table and include them in Section 9 (References) of this FOST.</p>	<p>Reference has been added to Chapter 9.</p> <p>RFA 44 has been moved to the FOSL. NFA date for RFA 69 has been added.</p> <p>RFA 147 has been added to figure 5d.</p> <p>Note refers to the VSIs conducted for the 2003 EBS. Each RFA site was revisited as part of the EBS by conducting a VSI to double check the condition of the site. RFA 1 and RFA 2 receive closure in 1996 as referenced in the table. It is not necessary to document the fact that VSIs confirmed this in 2002, therefore text regarding recent EBS activities has been removed to be consistent with the notes for the other RFA sites (if evidence of a release was noted during the 2002 VSIs, it would be noted).</p> <p>The notes do not indicate that wastes were released at the site; rather, only storage of wastes, and therefore a Category 1 designation is appropriate. The notes has been clarified to state that storage of wastes was identified.</p> <p>The information regarding presence of TRPH at RFA 46 resulted in an ECP Type 3 and the extent of information provided is consistent with the notes section for this table. A sentence has been added for RFA 96 regarding absence of any releases to correlate the ECP Type 1.</p> <p>Source has been added.</p>
73.	Table 5, Temporary Accumulation Area Sites.	<p>Please ensure that the "Notes" contain sufficient information to justify the ECP category listed.</p> <p>Several of the "Notes" list a "SWMU/AOC #." How does this relate to the TAA ID #? Please explain.</p> <p>The "Notes" for TAA 10 are confusing. The first sentence says that sampling results exceeded residential PRGs, but</p>	<p>Notes reflect the information presented in Table 4-3 of the EBS.</p> <p>SWMU number was the previous ID used before the installation switched over to addressing the sites as TAAs.</p> <p>Sampling was conducted during the RFA sampling visits. Additional information has been added as appropriate to clarify previous sampling.</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
		<p>the next sentence says there were no visible signs of release noted during a 2002 VSI. Please explain.</p> <p>The first page of the table says "Page 1 of 2" but there is only one page. Is the page numbering incorrect, or are we missing a page?</p> <p>Please list the appropriate sources for this table and include them in Section 9 (References) of this FOST</p>	<p>The VSIs conducted for the EBS were visual observations only and did not include sampling.</p> <p>Page numbering has been corrected.</p> <p>Source has been added.</p>
74.	Table 6, Aerial Photograph Anomaly Sites	<p>APHO 26 is listed on this table, but is not depicted on the corresponding figure (5d). Please correct the inconsistency.</p> <p>The "Notes" for APHO 1 state, "...this EBS..." Please state to which EBS it is referring.</p> <p>Most of the NFA concurrence letters are dated 1999 or 2000. However, the corresponding "Notes" indicate that investigations were going on well past the date of the NFA concurrence letters. This is confusing. Please explain.</p> <p>There are a number of instances where the "Notes" don't equate to the ECP category listed. Please ensure that sufficient information is provided in the "Notes" to justify the ECP category listed.</p> <p>According to the table, there are 17 APHO sites that have not received regulatory concurrence for NFA. Why are they listed in this FOST as suitable for transfer?</p> <p>APHO 4 is listed in Parcel V-A, however, Figure 5a shows APHO 4 in both Parcel V-A and II-A. Please correct the inconsistency.</p> <p>APHO 8 is listed in Parcel II-A, however, Figure 5b shows APHO 8 in both Parcel II-A and largely in Parcel III-A. Please correct the inconsistency.</p> <p>APHO 110 is listed in Parcel II-A, however, Figure 5a shows APHO 110 right on the border of II-A and V-A. Please make any necessary corrections.</p> <p>Many of the "Notes" state that a particular area was addressed with the "Stable Area Anomalies". Please</p>	<p>APHO is addressed in the FOSL and has been removed from the table.</p> <p>A reference to the 2003 EBS has been included.</p> <p>Further investigation for each APHO (and other LOCs) included revisiting the site during the VSI to confirm the condition of the site. The most current NFA letters are listed in the table. Both FA and NFA sites were visited during the 2002 VSIs as a matter of course; notes indicating VSIs were conducted were not intended to convey ongoing investigations.</p> <p>Notes reflect the information presented in Table 4-4 of the EBS. ECP Category reflects the category presented in the 2003 MCAS El Toro Business Plan. Due to numerous factors that are considered when making an ECP type determination, the notes section may not include a discussion of all of the factors when attempting to consolidate and summarize information. Efforts were made to justify the ECP types as much as possible.</p> <p>These sites have recently received concurrence and the NFA information has been added to the table in the Draft Final FOST.</p> <p>APHO 4 is in Parcel V-A.</p> <p>APHO crosses into both Parcels II-A and III-A.</p> <p>APHO 110 is in Parcel II-A, Figure location has been adjusted.</p>

**Document Title:**

(1) Draft Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station (MCAS), El Toro, California

**Reviewer:** Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. **Dated:** July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
		<p>explain.</p> <p>The page numbering is incorrect and should be corrected.</p> <p>Please list the appropriate sources for this table and include them in Section 9 (References) of this FOST.</p>	<p>The note indicates that a number of APHOs within the stable area were addressed during the same time period.</p> <p>Page numbering has been corrected.</p> <p>Source has been added.</p>
75.	Table 7, AST/UST Sites.	<p>USTs 1A, 1B, 65A, 75A, 75B, 75C, 98A, 101, 147, 259, 347A, 347B, 347C, 347D and 399 are included in this table, but are not included on Figure 7c. Please correct the inconsistencies.</p> <p>USTs 101 and 259 are included in this table, but are not included in the Draft Final EBS (2003). Please correct the inconsistencies.</p> <p>Please ensure that all the "Notes" include the name of the regulatory agency/agencies that concurred with the NFA, indicate if it was in a letter and include the date of the letter. Not all of the "Notes" contain this information.</p> <p>Please review the entire table and ensure that the "Notes" provide sufficient information to justify the ECP category listed for each site.</p> <p>There are a number of instances where the "Notes" don't equate to the ECP category listed. For instance, the "Notes" for AST 670 say no releases identified, but instead of being assigned an ECP category of 1 it is listed as an ECP category 2a. Please review the entire table and make any necessary corrections.</p> <p>At least 32 of the 270+ USTs/ASTs have "SWMU/AOC" numbers associated with them. What does this mean and how are they different from the other USTs/ASTs that do not have this designation?</p> <p>There are four ECP category 4's listed in this table. UST</p>	<p>Information (text, tables, and figures) regarding ASTs and USTs within the FOST has been revised based on the comments.</p> <p>The "Notes" has been made more complete with the requested information.</p> <p>Please refer to the 4<sup>th</sup> response to Specific Comment #74 regarding ECP categories.</p> <p>AST 670 was reviewed and a conservative ECP determination was made – Navy does not recommend any change.</p> <p>The SWMU identifier is additional information that was available for the tank locations. Some tanks were given an SMWU identifier during the RFA, although these designators may not have been appropriate for some LOCs. However, since these designators exist, this information was included. A note has been added to the UST/AST table regarding SWMU identifiers.</p>

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Comment No.	Section/ Page No.	Comment	Response
		<p>625 (SWMU/AOC 156) contained waste oil and was closed by the RWQCB. UST 662 contained fuel oil and was closed by the OCHCA. UST 766B (SWMU/AOC 221) and UST 675A (SWMU/AOC 188) contained waste oil and were closed by the OCHCA. An ECP category 4 indicates areas where release, disposal, and/or migration of hazardous substances have occurred, and all remedial actions necessary to protect human health and the environment have been taken. Have the ECP categories been incorrectly identified for these sites? If not, why didn't DTSC provide an NFA concurrence since hazardous substances were involved?</p> <p>Over 160 USTs received NFA concurrence from the OCHCA. Please provide us with information on the cleanup standards used by the OCHCA to make its no further action determinations for USTs. Also, please explain what constituted a RWQCB cleanup/closure vs. an OCHCA cleanup/closure. Based on recent correspondence with the Navy (June 2003), our understanding is that the OCHCA generally approved closure of removed tanks if soil contamination was below 10,000 ppm for petroleum. If concentrations were higher, the RWQCB would take over and ultimately approve any closure.</p> <p>AST 380 and USTs 39, 117, 126, 224, 308, and T-9 are listed on this table, but are not on the corresponding Figures 7a-7c. Please correct the inconsistencies.</p> <p>UST 553 is shown on page 12 of 12 and on page 16 of 16 in Table 7. Please make the necessary correction. Also, the parcel for UST 553 should be listed as "II-A" rather than "II-AD".</p> <p>UST 554 is shown on page 16 of 16 in Table 7, but should be on page 12 of 12 and the parcel should be listed as "II-A" rather than "II-AD". Please make the changes.</p> <p>On page 17 of 17 (Table 7) there is a heading titled "Parcel V-A" however, the first three USTs listed under the heading identify the parcels as II-A. Please correct the</p>	<p>Small tanks associated with an OWS (e.g. UST 625, 766B, 675A) were generally closed as a category 3 or 4 since runoff entered the OWSs, thus it would not accurately be a category 2, yet unless a spill or release of hazardous substances was known, it was assumed no hazardous substances were in the OWSs. These OWSs were closed under the RWQCB or OCHCA. Small tanks that contained waste JP-5 were generally considered category 2, since they contained JP-5 fuel that did not meet specifications, and thus was not useable and considered "waste" although no hazardous substances would have been present along with the JP-5. Large waste oil tanks were associated with tank farms/petroleum storage, and unless a release or spill of hazardous material was known, these waste tanks were also considered category 2. UST 662 has been changed to category 2b.</p> <p>Please refer to the State Water Resources Control Board's 1989 Leaking Underground Fuel Tank (LUFT) Field Manual for a discussion on cleanup standards. A matrix in the field manual discusses the different types of fuels, concentrations, and depth to groundwater, as well as other factors that are used to consider if a site may be closed and which agency has oversight. Please see response to General Comment #10.</p> <p>Figures 7a-7c and Table 7 have been reviewed and corrected as appropriate.</p> <p>Table 7 has been reviewed and corrected as appropriate.</p> <p>Table 7 has been reviewed and corrected as appropriate.</p> <p>Table 7 has been reviewed and corrected as appropriate</p>

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Comment No.	Section/ Page No.	Comment	Response
		<p>inconsistencies.</p> <p>In looking at Figure 7a, it appears that USTs 196 and 197 are in both Parcel II-A and V-A, however, Table 7 has them listed in Parcel II-A only. Please correct the inconsistencies.</p> <p>The page numbering is incorrect and should be corrected.</p> <p>Please list the appropriate sources for this table and include them in Section 9 (References) of this FOST.</p>	<p>Figure 7a has been reviewed and corrected as appropriate.</p> <p>Page numbering has been corrected</p> <p>Source has been added.</p>
76.	Table 8, Oil/Water Separators.	<p>There are a number of instances where the "Notes" don't equate to the ECP category listed. For instance, OWS 626-1 states "All required response actions have been completed." Based on the notes it seems as though an ECP category 4 should've been assigned rather than a 3. OWS 626-2 and OWS 626-3 both state that "No releases identified; OWS appeared sound." Why was an ECP category 3 assigned rather than a 1? OWS 626-4 and OWS 626-5 both state "OWS appeared sound." Why was an ECP category 3 assigned rather than a 1? Please explain and make any necessary changes. OWS 896 and OWS 371 both need more information included in the "Notes" to justify an ECP category 3. Please see "Notes" for OWS 280A as an example.</p> <p>Please list the appropriate sources for this table and include them in Section 9 (References) of this FOST.</p>	<p>A response action for OWS 626-1 was to remove it in order to make room for OWS 626-2; therefore a category 3 is still considered appropriate for this site. OWS 626-4 and 626-5 were in the area of IRP Site 20 that is considered a category 3. In this case these OWSs within the footprint were made consistent. OWS 896 is within the runway area that is category 3. Please refer to the 4<sup>th</sup> response to Specific Comment #74 regarding ECP categories.</p> <p>Source has been added.</p>
77.	Table 9, Wash Racks.	<p>RFA 210 is not shown on the corresponding figures. Please make the appropriate corrections.</p> <p>Please list the appropriate sources for this table and include them in Section 9 (References) of this FOST.</p> <p>Figure 8c includes RFA 305, Septic Tank System, however, it is not listed in this table. Please make the necessary corrections.</p>	<p>RFA 210 is now addressed in the FOSL.</p> <p>Source has been added.</p> <p>The septic tank at RFA 305 is not associated with a wash rack; therefore, it is not included in Table 9 but is included in Table 3 (RFA Sites).</p>



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Comment No.	Section/ Page No.	Comment	Response
		There are a number of instances where the "Notes" don't equate to the ECP category listed. Please review the "Notes" and ECP category for RFA 157 and RFA 270 and make any necessary changes. For sites listed as an ECP category 1, it would be helpful to state that no release or disposal occurred.	Please refer to the 4 <sup>th</sup> response to Specific Comment #74 regarding ECP categories.
78.	Table 10, PCB Transformers and PCB Transformer/Equipment Storage Areas.	<p>Were all the transformers listed as replaced, replaced with non-PCB transformers?</p> <p>Why isn't the maximum PCB content of each transformer shown in this table?</p> <p>All but one of the "Notes" reference a 2002 EBS. What 2002 EBS? There is no 2002 EBS listed in Section 9. Please explain.</p> <p>PCBs T079, T091, T092, T093, T095 and T124 are listed in this table, but are not included on the corresponding Figures 9a-9c. Please correct the inconsistencies.</p> <p>Please ensure that the ID numbers listed in the table are consistent with those in the corresponding Figures 9a-9c. Currently, they are not consistent (i.e., PCB T002 vs. PCB T2).</p> <p>Why don't the "Notes" for PCBs T109-T115 state that the transformer was either removed or replaced?</p> <p>The ECP category is missing for PCB T057. Please include the ECP category.</p> <p>The table shows PCBs T026 and T027 in Parcel II-A, but Figure 9a shows them in Parcel V-A. Please correct the inconsistencies.</p> <p>The table shows PCBs T064, T065 and T102 in Parcel II-A,</p>	<p>PCB transformers were replaced with non-PCB transformers. A more detailed discussion and information on PCBs is found in the EBS. The FOST is intended to summarize this information. This information was provided in Section 4.1.5 and the notes in Table 9 (formerly Table 10 in the Draft FOST) indicate this.</p> <p>2002 EBS has been changed to 2003 EBS. Visual site inspections were conducted in 2002.</p> <p>Information (text, tables, and figures) regarding PCB transformers and PCB equipment within the FOST has been corrected based on the comments.</p> <p>Missing information has been provided.</p> <p>Missing ECP information has been provided.</p>

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Comment No.	Section/ Page No.	Comment	Response
		<p>but Figure 9c shows them in Parcel I-A. Please correct the inconsistencies.</p> <p>The "Notes" for PCB T075 say that the transformer contains 104 ppm PCBs and requires removal/replacement. Why hasn't it already been removed/replaced?</p> <p>Two of the sources listed on page 7 of 7 are not included in Section 9 of the FOST. Please include them as appropriate.</p>	<p>Missing information for PCB T075 has been provided.</p> <p>Sources have been included as appropriate.</p>
79.	Table 11, Non-Transformer PCB Equipment.	Building No. 138 is shown in Parcel II-A of this table, but it is shown in Parcel V-A on Figure 9a. Please correct the inconsistency.	Discrepancy has been corrected.
80.	Table 12, Miscellaneous Locations of Concern.	<p>Please list the appropriate source(s) for this table and include them in Section 9 (References) of this FOST.</p> <p>The second column should be titled "MSC ID" instead of "PRL ID". Please make the change.</p> <p>"MSC JP5" is listed under the Parcel II-A heading, but is listed as "Stationwide". The Miscellaneous LOCs figures only show "MSC JP5" in Parcel II-A. Please clarify and make any necessary changes to the document.</p> <p>MSC ST20A, MSC ST20B, MSC ST19A, and MSC ST 19B all state RWQCB concurrence with NFA on a particular date. Was this concurrence stated in a letter from the RWQCB? If so, please provide this information in the "Notes".</p>	<p>Source has been added.</p> <p>Column heading has been corrected.</p> <p>MSC JP5 is now addressed in the FOST.</p> <p>Note has been revised to clarify concurrence was in a letter.</p>
81.	Table 13, Environmental Factors Considered.	This table should list all environmental factors considered, even if they do not require a notification or restriction (i.e., radon, school site considerations, monitoring wells, prime/unique farmland, wetlands, flood plains, sensitive habitat, historic property, etc.) The Navy should have considered all of these factors and more. Miscellaneous	The purpose of the FOST is to support the United States' CERCLA Section 120(h)(3)(A)(ii)(I) covenant determination that all necessary remedial action has been taken to address storage, release or disposal of hazardous substances. No edits regarding environmental factors have been made, since the factors listed are not relevant to CERCLA. Only issues relating to CERCLA and other clean-up programs that address

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Comment No.	Section/ Page No.	Comment	Response
		LOCs was considered, but is missing from the table. Instead of using "x" to identify the need for a restriction or notification, please use "yes" or "no". In column 1: please change "Hazardous substances waste sites" to "Hazardous substances", "Wastewater and related systems" to "Wastewater treatment and related systems" and "Pesticides" to "Pesticides/Herbicides". Please include a column for Parcel V-A. Please refer to MCAS Tustin's FOST #3 (Transfer Parcels 23, 29, 34, 35 and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41), Table 5 for an example.	hazardous substances and similar chemical contamination need to be addressed in Table 13, i.e. RCRA, UST, DERP, and similar state laws. See p. F-31 and F-32 of DoD Base Reuse Implementation Manual (BRIM). This table will also be updated to include radon and radiological surveys in accordance with the BRIM.  Errors in the table has been corrected and consistent in presentation so as to be consistent with FOST 3 for MCAS Tustin, as requested. A column for Parcel V-A has been added.
82.	Table 14, Summary of Asbestos Surveys.	<p>The way in which this table was put together does not provide sufficient information to the reviewer to determine whether or not the appropriate notifications/restrictions have been applied to the buildings/structures included in this FOST. Please refer to MCAS Tustin's FOST #3 (Transfer Parcels 23, 29, 34, 35 and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41), Table 7 for an example of how the table should be set up and the type of information that should be included.</p> <p>This table does not include all the buildings/structures that are listed in Section 5-11. All buildings/structures located on the property proposed for transfer should be listed on this table, and if they did not have a survey performed, then the table should include that information.</p> <p>This table is not consistent with Section 5-11 and it should be. For instance, the table states that Bldgs. 11,12 and 683 had no ACM identified in the most recent survey, but Section 5-11 has the buildings listed as non-FAD ACM. Bldgs. 65, 94, 327, 5101, 688, 828, 1809 and 25 are included on this table, but are not listed in Section 5-11. Bldgs. 26 and 27 are listed on this table as being in Parcel III-A, but in Section 5-11 it has the bldgs. in Parcel II-A.</p> <p>The page numbering is incorrect and should be corrected.</p> <p>On page 11 of 10 [sic], please include all acronyms/abbreviations used in this table. Currently, there are a number missing.</p>	<p>The asbestos table identifies the findings for the asbestos surveys that have been conducted at facilities within each parcel. Asbestos information presented in the 2003 EBS is presented in Table 14 of the FOST. The Comments section has been enhanced with ACM information.</p> <p>All buildings/structures and their survey status has been listed on Table 14.</p> <p>Text has been reviewed and revised as appropriate to reflect the asbestos survey information.</p> <p>Page numbering has been corrected.</p> <p>Acronyms and abbreviations have been rechecked.</p>

**Document Title:**

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*Reviewer:* Mr. John Scandura, Chief, Southern California Branch, Office of Military Facilities, DTSC. *Dated:* July 17, 2003

Comment No.	Section/ Page No.	Comment	Response
		Please list the appropriate source(s) for this table and include them in Section 9 (References) of this FOST.	Source has been added.
83.	Table 15, Notifications and Restrictions Summary.	In anticipation of significant changes and due to time constraints, DTSC will not review this table until the draft final stage. However, we would like to note that there are 38 facilities listed on this table that are not included in Table 1. There are 30 facilities listed in Table 1 that are not included in this table. There are eight instances where a facility is listed twice in this table. San Joaquin and NAMAR housing is discussed in Section 5.12. Why aren't they listed in this table?	Table 15 has been reviewed and revised as appropriate to correct the discrepancies noted and to confirm it correlates to the text and tables of the FOST.

## **Response to Comments on the Draft Final FOST**

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

Reviewers: Nicole Moutoux, Project Manager, Federal Facilities Cleanup Branch, U.S.EPA, Region IX; Dated: December 18, 2003

Comment No.	Section/ Page No.	Comment	Response
GENERAL COMMENTS			
1.		All comments on the FOSL must be resolved final to finalization of the FOST. These documents are so interconnected that issues affecting one affect the other as well. In addition, comments made by agencies on the draft FOSL and FOST should be addressed and reviewed by the agencies prior to inclusion into the final documents.	The Final FOST and FOSL will be completed concurrently to ensure consistency between the two documents. A revised Draft Final FOST and FOSL will be made available to the regulatory agencies for review prior to signing the documents to ensure all comments have been addressed.
2.		In the response to EPA's comments on the draft FOST, the Navy indicated that they would discuss groundwater contamination in Chapter 1. Chapter 1 does not contain such a discussion. Such a discussion should be provided and would be appropriately placed in Chapter 5 where other contaminated areas are discussed. The summary should reference Attachment 6 which shows contaminated groundwater plumes at the base.	Attachment 6 was shaded with areas to show Sites 1, 2, and 17. However, discussion was not included in Chapter 5 since this chapter addresses notifications and restrictions, and there are no groundwater notifications or restrictions on FOST property.
SPECIFIC COMMENTS			
1.	Figure 4, Attachment 6, and Section 5.3	A discussion of the plume at Site 2 should be included here or within the groundwater summary section as requested in general comment number 2. IRP Site 2 should be shown on Figure 4 and the plume and associated buffer zone should be shown on Attachment 6.	Sections 4.1.3 and 5.3 in the Draft Final FOSL were updated appropriately since IRP 2 is more relevant to the FOSL.  Figure 4 has Note 1 that indicates: "Only IRP Sites within FOST property are shown." Since there aren't any further action IRP sites on this figure, it is not recommended to add IRP Site 2. However, Attachment 6 was revised to show the plume and its buffer zone for Site 2, as well as showing shaded areas for Sites 1, 2, and 17.
2.	Table 4	TAA 636 is designated as Category 6 which is not transferable. Please reconcile.	NFA concurrence for TAA 636 was received on 9/29/2003. TAA 636 has been revised to be Category 3.

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

Reviewers: John Scandura, Chief, Office of Military Facilities, Southern California Branch, DTSC; Dated: February 20, 2004

Comment No.	Section/ Page No.	Comment	Response
<b>COVER LETTER</b>			
1.		Landfill Buffer Zones – Installation Restoration Program Sites 3 and 5 and Anomaly Area 3 require buffer zones around the perimeter of the waste disposal areas to ensure protection of public health and the environment and compliance with landfill requirements set forth in the California Code of Regulations, Title 27. The buffer zones for these sites are currently under negotiations between the state regulatory agencies and the Navy. DTSC will concur with the FOST once parties have reached agreement on the appropriate buffer zones around these sites.	The Navy concurs that the FOST will be finalized after an agreement on appropriate buffer zones has been reached.
2.		<p>Resource Conservation and Recovery Act (RCRA Obligations) – During its operation, MCAS El Toro held a hazardous waste facility permit issued by DTSC pursuant to RCRA and the California Hazardous Waste Control Law. Furthermore, on July 1, 1999, DTSC notified the Navy that Marine Corps Air Station (MCAS) El Toro was under RCRA Interim Status for the operation of the Explosive Ordnance Disposal Range and must complete RCRA closure for that unit. To date, MCAS El Toro has not completed the closure requirements for the range; therefore DTSC still considers MCAS El Toro to be a Hazardous Waste Management Facility and fully subject to RCRA regulations.</p> <p>The permit identified solid waste management units (SWMUs) and areas of concern (AOCs) that are subject to corrective action requirements under RCRA and the California Hazardous Waste Control Law. The state regulatory agencies issued no further action determinations at SWMUs and AOCs that had remedial actions conducted pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). RCRA corrective action obligations at these sites have not been terminated under a process similar to</p>	<p>The Navy and DTSC have recently agreed in principle to coordinate DTSC's RCRA corrective action completion and facility boundary redefinition with the Navy's Finding of Suitability for Transfer (FOST) in discussions among the Navy, DTSC, and the U.S. Environmental Protection Agency occurring after the date of DTSC's February 20, 2004 letter. This agreement resolves a number of issues previously under discussion, so therefore the Navy does not intend to further respond. However, the Navy reserves its right to respond fully at a later date to those issues for which agreement was not reached, if the agreement in principle is not implemented.</p> <p>Pursuant to the recent agreement, DTSC's proposed determination of completion of RCRA corrective action and RCRA facility boundary redefinition and the Navy's Draft Final FOST will be simultaneously published for a forty-five day period of public review and comment. The Navy and DTSC will issue a joint public notice announcing this public comment period in a major local newspaper of general circulation. The notice will also be mailed to former MCAS El Toro's mailing list that includes DTSC's mandatory mailing list. The Navy's Draft Final FOST will include a summary of the proposed corrective action completion determination and RCRA facility boundary modification as a section of that document. The Navy's Final FOST will include responses to public comments on the Draft Final FOST, and the Navy will sign the Final FOST. DTSC</p>

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*Reviewers: John Scandura, Chief, Office of Military Facilities, Southern California Branch, DTSC; Dated: February 20, 2004*

Comment No.	Section/ Page No.	Comment	Response
		<p>a permit modification. On January 7, 2004, Assistant Secretary of the Navy Hansford T. Johnson requested the California Environmental Protection Agency (Cal/EPA) and United States Environmental Protection Agency (U.S. EPA) to forgo this permit modification process.</p> <p>In a response dated February 9, 2004 to Secretary Johnson's letter, Cal/EPA Secretary Terry Tamminen stated that absent a request from prospective purchasers for a corrective action completion determination, and without legal decision or clear statement on this process from U.S. EPA, Cal/EPA will defer the requirements for terminating corrective action. Should a transferee request the certainty provided by this determination, they must apply to DTSC for the equivalent of a permit modification. DTSC will work closely and expeditiously with the applicant to make this determination where applicable, modify the MCAS El Toro boundaries as appropriate, and eliminate potential RCRA obligations.</p>	<p>will address public comments on RCRA corrective action completion determination and facility boundary modification. After addressing public comments and if DTSC feels that it has adequately addressed all comments on the RCRA corrective action completion determination and the facility boundary modification, DTSC has indicated that it intends to issue its final RCRA determination before the Navy signs the Final FOST. The Navy intends to summarize the final DTSC RCRA corrective action completion determination and RCRA facility boundary redefinition in the Final FOST as a section of that document. The Navy will publish a notice of availability of the Final FOST for inspection and copying.</p> <p>DTSC's final RCRA corrective action completion determination and RCRA facility boundary redefinition will not be subject to administrative appeals.</p>
3.		<p>School Site Considerations – The Navy has identified the reuse of the former base as "mixed land use", which could include education. Pursuant to the California Education Code, section 17210, et seq., a separate and comprehensive environmental review is required for sites where state funds will be used for property acquisition or school construction. The law requires DTSC to make a determination, based on this review, as to the suitability of the property for school use. The Navy includes a discussion of this requirement in Chapter 5.1 of the draft final FOST. DTSC will concur with the FOST once this requirement is identified and included as a notification in Chapter 5.1, Table 12 and Table 15, as outlined in Enclosure A.</p>	<p>The Navy appreciates Cal/EPA's concurrence on the FOST once "School Site Considerations" has been identified and included as a notification in Chapter 5.1, Table 12 (now Table 13) and Table 15a (now Table 16a), as outlined in Enclosure A.</p>



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*Reviewers: John Scandura, Chief, Office of Military Facilities, Southern California Branch, DTSC; Dated: February 20, 2004*

Comment No.	Section/ Page No.	Comment	Response
4.		Lead-Based Paint (LBP) Disclosure and Remediation – The FOST includes numerous buildings that were constructed prior to 1978, the year when LBP products were discontinued. DTSC considers the presence of exterior LBP that has been released to the soil to pose a potential release to the environment pursuant to CERCLA. As such, soil sampling in the vicinity of pre-1978 buildings is necessary to ensure that lead from LBP is not present at levels posing a threat to human health and the environment. The Navy conducted LBP evaluations at residential buildings on the former base, but has not evaluated soil-lead hazards at nonresidential buildings. Without these evaluations, the Navy must place appropriate restrictions and notifications in the FOST and all associated sale and transfer documents to ensure public health and environmental protection. DTSC will concur with the FOST once all LBP restrictions and notifications that were conveyed to the Navy on February 3, 2004, are incorporated into the appropriate sections of the document.	The Navy appreciates Cal/EPA's concurrence on the FOST once all LBP restrictions and notifications discussed on February 3, 2004 have been incorporated into the appropriate sections of the document. The third sentence under "Nonresidential Structures" on page 5-11 has been added to the "Restrictions" section on page 5-13 of the Draft Final Revision 2 FOST.

**GENERAL COMMENTS**

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

*Reviewers: John Scandura, Chief, Office of Military Facilities, Southern California Branch, DTSC; Dated: February 20, 2004*

Comment No.	Section/ Page No.	Comment	Response
1.		Please ensure consistency between the FOST, the Final Environmental Baseline Survey (EBS), and the FOSL. DTSC notes the following inconsistencies. Figure 2 in the Draft Final FOSL shows a Carve-out II-CC and in Attachment 6 of the Draft Final FOST there is no Carve-out II-CC. In fact, the FOST shows Carve-out II-N in the same location as Carve-out II-CC. The area listed as Carve-out II-N on Figure 2 of the FOSL is not shown as a carve-out on Attachment 6 of the FOST. There is also a discussion in the FOST of Resource Conservation and Recovery Act corrective action requirements that is not in the FOSL. We recommend finalizing the FOST and FOSL at the same time so that the regulatory agencies have an opportunity to review the revised versions of each simultaneously.	<p>Carve-out II-N in the Draft Final FOSL contained a site that received NFA concurrence between printing the Draft Final FOSL and Draft Final FOST. Therefore, former II-CC was renamed II-N to simplify renaming carve-outs. NFA closure of several sites was received between the time the EBS was finalized, as well as between the times the Draft Final FOST and Draft Final FOSL were submitted, resulting in removing associated carve-outs. Thus, several carve-out IDs have changed. The Draft Final FOST dated November 2003 was adopted as the baseline for Carve-out IDs. Accordingly, if a Carve-out was removed since this publication date, that Carve-out was not reassigned. However, prior to signing the Final FOST, any gaps in labeling sequence will be filled in and carve-outs will be renamed, as appropriate.</p> <p>Both documents will be completed and submitted together for the final version to ensure revisions are consistent. The discussion of RCRA issues in the final FOST and FOSL documents are not identical due to the different purposes of the documents, but the discussions are consistent.</p>
2.		Please ensure that text, tables and figures within this FOST are consistent with one another. For example, there is inconsistency between the buildings listed in the text for various sections, the buildings depicted on Figure 2 and Attachment 6, and the buildings listed in Table 1. Please see specific comments below.	Some building inconsistencies are due to the fact that Table 1, Figure 2, and Attachment 6 do not list demolished buildings (see note at end of Table 1) whereas the text does discuss both demolished and non-demolished buildings due to their previous association with LOCs. A note has been added to the text to clarify which buildings have been demolished. Table 15b (now Table 16b) currently lists all buildings and shows which buildings are demolished. Other inconsistencies between Table 1, Figure 2 and Attachment 6, and the text have been corrected.
3.		The applicability of California Code of Regulations, title 27, section 21190 for IRP Sites 3 and 5 is being discussed among the regulators and the Navy. Prior to finalization of the FOST, an adequate buffer zone around the landfills must be established that will comply with Title 27 and provide for the protection of public health and the environment.	The appropriate buffer zone for Sites 3 and 5 will be resolved with regulator concurrence prior to signing the Final FOSL/FOST. CIWMB provided a letter to the Navy on April 20, 2004 agreeing to a 100-foot buffer zone. This buffer zone has been incorporated into the FOSL in the text and figures, as appropriate.

**Document Title:**

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Comment No.	Section/ Page No.	Comment	Response
4.		The applicability of California Code of Regulations, title 27, section 21190 for Anomaly Area 3 is also being discussed among the regulators and the Navy. A Draft Expanded Site Inspection Report was issued in November 2003 and is currently under regulatory review. Methane gas in some areas is five times the lower explosive limit (LEL). Prior to finalization of the FOST, an adequate buffer zone around Anomaly Area 3 must be established; one that will comply with Title 27 and provide for the protection of public health and the environment.	Please see response to General Comment #3.
5.		Soil contaminated with concentrations of PCBs greater than residential PRGs, with a maximum reported concentration of 20 mg/kg, have been left in place at IRP Site 19 at a depth of 11 feet below ground surface (bgs). Currently, the Navy has placed a notification in the FOST. Although there were no land use restrictions required under the 1997 ROD, DTSC strongly recommends that the property be restricted and that the land use restrictions be put in place upon property transfer through a State land use covenant pursuant to California Code of Regulations, title 22, section 67391.1.	Please refer to response to EPA's Specific Comment #8 on the Draft FOST. Sections 4.1.2.2 (now 4.1.2.3) has been expanded to further discuss PCB's remaining in the soil at a depth of 11 feet bgs; however, in accordance with the 1997 ROD, no restrictions will be placed on IRP Site 19. The second paragraph of Section 5.3 had been moved to Attachment 2b.

**Document Title:**

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Comment No.	Section/ Page No.	Comment	Response
6.		<p>DTSC sent the following comment to the Navy on December 12, 2003 regarding the Draft Final FOSL:</p> <p>"The portion of the groundwater plume associated with IRP 2 (which is located within the property transferred to the Federal Aviation Administration [FAA]) that has migrated on station (Carve-out II-X) needs to be explained in much greater detail in the text and needs to be shown on the appropriate figures and tables. Please be sure to include an adequate buffer zone and explain the Navy's rationale for the size of the buffer zone. Is Carve-out II-X the only carve-out area impacted by the IRP 2 groundwater plume?"</p> <p>In making the above comment, DTSC must determine if a sufficient area has been carved out for the plume and the potential migration of the plume. DTSC wants to ensure that the proposed transfer area would, in no way, be negatively impacted by the IRP Site 2 groundwater plume. Please provide information supporting the Navy's belief that IRP Site 2 will not negatively impact the property proposed for transfer.</p>	<p>A buffer zone for the groundwater plume at Site 2 was not previously defined; however a 200 ft buffer around the plume has been included in the FOSL. This buffer is based on data collected during the aquifer test where hydraulic influence was not documented (on average the largest distance pumping effects were observed was approx. 100 feet). Carve-out II-X has been adjusted accordingly in order to include the 200 ft buffer for the plume. No other existing carve-out is impacted by the groundwater plume itself, although the buffer zone has been partially captured by Carve-out II-F that has been expanded to address the buffer zone and for ease of managing the property.</p> <p>Sections 4.1.3 and 5.3 in the Draft Final FOSL have been updated appropriately.</p> <p>Since IRP Site 2 is in the FAA property and is not part of the FOSL, reference to the groundwater plume has been added as an endnote to Table 7 (and not listed in the body of the table). This is to minimize confusion that the actual IRP Site 2 is part of the FOSL property.</p> <p>Figure 5a has been revised accordingly. Note 2 of the figure will be revised as follows: "Only IRP Sites within FOSL property are shown; IRP Sites 1, 2, and 17, which require further action, are located on FAA property and are not shown."</p>
7.		Please include a table for the IRP Sites. It should be similar to the IRP Site table in the FOSL.	A table listing IRP Sites located on transferable property has been added as Table 6 to the Draft Final FOST Revision2.
8.		Please include a table for the various wells located on property proposed for transfer. In the first round of comments on the FOST, DTSC made a request for well information to be included in text and table. The text was added, but the table was not. It is important for the transferee to have an accurate listing of all wells and their survey locations.	<p>There are no wells remaining on FOST property. All wells requested for decommissioning in 2003 were decommissioned in December 2003, with the exception of 4 wells associated with Tank Farm 2, and a Closure Report was submitted in February 2004. The last sentence of Section 7 will be deleted, as well as the relevant information in Tables 15a/b (now is Table 16 a/b). Therefore, no restrictions for wells are needed in the FOST. A new carve-out for the four Tank Farm 2 wells has been added to the FOSL.</p> <p>Chapter 5 and Table 12 (which is now Table 13) will be modified as appropriate.</p>

**Document Title:**

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Comment No.	Section/ Page No.	Comment	Response
9.		Are there any buildings/structures where a portion of the building/structure is proposed for lease and the other is proposed for transfer?	Buildings will either be entirely transferred or entirely leased. Maps have been reviewed to ensure that no buildings are split by parcel boundaries.
10.		Are there any buildings/structures that are located in more than one parcel?	Maps have been reviewed to ensure that no buildings are split by parcel boundaries.
11.		Prior to the document going final, DTSC would like to discuss with the Navy the unresolved comments that will go into Attachment 5.	Unresolved comments will be discussed prior to finalizing the FOST.
12.		DTSC requests an opportunity to review and provide any comments, prior to its publishing, on the public notice of the Navy's intent to sign the FOST.	See Navy response to Comment #2 in DTSC's February 20, 2004 cover letter. The Navy will provide DTSC with the opportunity to expeditiously review a final draft of the Notice of Availability of the Final FOST.
13.		Throughout the document, please ensure that sources/references are cited when appropriate and that they are included in Section 9.	Sources/references throughout the document have been edited/added as appropriate.
14.		Please ensure that acronyms are spelled out the first time they are used in text. This has not been done consistently throughout the document.	Acronyms/abbreviations have been rechecked and corrected.
15.		Grammatical, typographical and alignment errors exist in the FOST and should be corrected.	The document has been rechecked for grammatical, typographic, and alignment errors and has been corrected where noted.

**SPECIFIC COMMENTS**

1.	Table of Contents, Page iv,	A few of the titles listed here are not consistent with the corresponding titles in the text of the document. Please ensure consistency.	The titles have been edited in the Table of Contents to be consistent with the corresponding titles in the text.
2.	Table of Contents, Pages vii, Attachments	The title for Attachment 3 doesn't say anything about radon, but the policy for radon is included in Attachment 3. Please change the title to include radon.	The title for Attachment 3 has been changed to "DOD Policies on Asbestos, Lead-Based Paint, and Radon at Base Realignment and Closure Properties."

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*Reviewers: John Scandura, Chief, Office of Military Facilities, Southern California Branch, DTSC; Dated: February 20, 2004*

Comment No.	Section/ Page No.	Comment	Response
3.	Table of Contents, Pages ix and x, Acronyms & Abbrev.	There are several acronyms used throughout the document that are not included in this list and should be (i.e., CCR, HSC and LRA).	Acronyms/abbreviations have been rechecked and corrected throughout the document and missing ones have been added to the list.
4.	Chapter 1, Page 1-1, Paragraph 3, Last Sentence	In the final FOST, please be sure to update the FOSL date.	The FOSL date has been updated in the FOST.
5.	Chapter 1, Page 1-1, Last Paragraph	If there is any new information regarding the annexation, please include in the final.	The City of Irvine's proposed annexation of installation property has recently been approved. The text has been updated to reflect the current status of Irvine's annexation.
6.	Chapter 1, Page 1-1, Last Sentence	Please state that the property is only suitable for residential use as long as the notifications and restrictions outlined in this FOST are adhered to.	Text has been added as appropriate. (Change has been made on page 1-2)
7.	Chapter 2, Page 2-1, Paragraph 1	According to Chapter 9, the "JEG 1995" reference listed here should actually be "JEG 1995a". Please make the correction.	The source reference has been corrected.
8.	Chapter 2, Page 2-2, Paragraph 1	The acreage listed in this paragraph is not consistent with the acreage listed in the Draft Final FOSL (page 2-1, paragraph 7). Please correct.	The acreage is not consistent due to updates that were made between the submittal of the Draft Final FOSL and the Draft Final FOST. The acreage has been revised to be consistent with the current FOSL.
9.	Chapter 2, Page 2-2	Please ensure that the number of facilities listed for each parcel is consistent with Table 1 and Section 4.2. Also, please ensure that the number of LOCs listed for each parcel is consistent with what is listed in Section 4.2, and take the "stationwide" LOCs into account, as appropriate. Currently, there are inconsistencies.	The number of facilities and LOCs has been reviewed and revised as appropriate to remain consistent.

## Document Title:

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Comment No.	Section/ Page No.	Comment	Response
10.	Chapter 2, Page 2-2, Last Paragraph, Last Sentence	Please ensure that this sentence is applicable to <i>all</i> LOCs. For instance, there is one LOC (PCB T75) that is an area type 1, but still requires "removal/replacement". Therefore, there is still further action to be done. Also, there are some LOCs where a regulatory agency may have concurred with the area type, but didn't actually write an NFA concurrence letter. Please clarify the sentence.	The sentence is accurate. All LOCs in the FOST require no further action (please refer to response to Specific Comment #25 regarding PCB T75). The sentence does not state an NFA letter is available for all LOCs, only that all LOCs are NFA, and that we have received regulatory concurrence on these NFAs. The regulatory concurrence is through the Final EBS if there is no NFA letter for a particular LOC (e.g., PCB transformers). Therefore, the sentence will not be edited.
11.	Chapter 3.2, Page 3-2, Paragraph 1	<i>"A 'No Further Action' (NFA) decision under one authority equates to an NFA determination under the others because of the similarity of their cleanup standards."</i> This statement reflects the Navy's conclusion about similarity of cleanup standards. DTSC does not necessarily agree with this statement in all cases. For example, as a matter of law, it has not yet been determined that conducting a CERCLA cleanup at a military base subject to RCRA requirements satisfies all the administrative and substantive obligations of RCRA at the subject facility. However, DTSC agrees that actions taken in accordance with CERCLA and approved by regulators in general satisfy RCRA corrective action requirements.	Please refer to Navy response to Comment #2 in DTSC's February 20, 2004 cover letter. The Navy requests that DTSC clarify that the Final FOST adequately documents that all necessary corrective action required to comply with the substantive technical standards and criteria for corrective action pursuant to RCRA Subtitle C and Chapter 6.5 of Division 20 of the California Health and Safety Code has been completed for the property covered by the Final FOST and no further cleanup is required to satisfy them (found in Chapter 3.4 and Attachment 8 to the FOST). The Navy understands from the last sentence of DTSC's Specific Comment #11 that DTSC concurs that RCRA Subtitle C corrective action for UST and AST sites within the area covered by the FOST has been completed.
12.	Chapter 3.2, Page 3-2, Paragraph 2	<i>"A decision that no action is required . . . made by DON or an environmental regulator . . . supports . . . a determination that all necessary RCRA Subtitle C corrective action has been completed."</i> DTSC, as the RCRA delegated authority, makes this determination.	Please refer to Navy response to Comment #2 in DTSC's February 20, 2004 cover letter.
13.	Chapter 3.2, Page 3-2, Paragraph 3	The FOST states that the RCRA permit provided that "The activities required by the [FFA] are intended to satisfy the corrective action requirements . . ." Note that the FFA-required activities referred to are cleanup activities, not agency completion of corrective action determinations.	Please refer to Navy response Comment #2 in DTSC's February 20, 2004 cover letter.

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Comment No.	Section/ Page No.	Comment	Response
14.	Chapter 3.2, Page 3-2, Paragraph 4	The FOST states that federal and State laws "are directed at achieving the identical cleanup standard: adequate protection of human health and the environment." The FOST does not cite to the whole complement of statutory language to which it refers. Note that different agencies are charged with making determinations under a number of statutes and additional considerations may apply under each of those statutes.	Please refer to Navy response to Comment #2 in DTSC's February 20, 2004 cover letter. (Page 1 of this Response to Comment document)



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Comment No.	Section/ Page No.	Comment	Response
15.	Chapter 3.3, Pages 3-3 and 3-4, Paragraph 5	The FOST states that meeting one or more regulatory standards in certain sections of the Health and Safety Code and in title 23 of the California Code of Regulations (CCR) ensured compliance with the cleanup standards in title 22 of the CCR. DTSC does not necessarily agree that complying with one section of the law pertaining to a cleanup automatically satisfies other relevant sections. When making corrective action completion determinations, DTSC must review the record pertaining to a cleanup activity in addition to the relevant laws and regulations.	<p>Please refer to Navy response to Comment #2 in DTSC's February 20, 2004 cover letter (Page 1 of this Response to Comment document). DoN understands that DTSC now concurs that <u>all</u> necessary corrective action required to comply with the substantive technical standards and criteria for RCRA Subtitle C corrective action has been completed at the sites addressed in cleanup decisions made by the Santa Ana Regional Water Quality Control Board and Orange County Health Care Agency (OCHCA) at the property covered by the Final FOST and that no further cleanup is required. The Navy understands from the last sentence of DTSC's Specific Comment #11 that DTSC concurs that RCRA Subtitle C corrective action for UST and AST sites within the area covered by the FOST has been completed.</p> <p>The Navy's and DTSC's public notices will state that access to review public records supporting the Santa Ana Regional Water Quality Control Board (RWQCB) and OCHCA cleanup/corrective action decisions for Underground Storage Tanks and Above-ground Storage Tanks relied upon in the Final FOST, including "no further action" decisions, may be obtained by contacting:</p> <p>Santa Ana Regional Water Quality Control Board 3737 Main Street, Suite 500 Riverside, CA 92501-3338</p> <p>(909) 782-4499 or</p> <p>Orange County Health Care Agency Custodian of Records: (714) 834-3536 Contact: Ms. Arghavan Rashidi-Fard Telephone: (714) 667-3713</p>
16.	Chapter 4.1, Page 4-1, Paragraph 1, Sentence 1	Please cite the appropriate reference for the BCP Guidebook and include in Section 9.	The BCP Guidebook has been referenced and included in Section 9.

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Comment No.	Section/ Page No.	Comment	Response
17.	Chapter 4.1, Page 4-1, Paragraph 2, Sentence 3	Please refer to Specific Comment #10 above.	Please refer the response to Specific Comment #10 above.
18.	Chapter 4.1, Page 4-1, Paragraph 2, Sentence 4	Please refer to Specific Comment #6 above.	The text has been revised on page 4-1.
19.	Chapter 4.1, Paragraph 3, Bullet #2	Please include information regarding buffer zones for IRP sites where there is no ROD in place.	For IRP Sites 3 and 5, and Anomaly area 3, CIWMB provided a letter to the Navy on April 20, 2004 agreeing to a 100 foot buffer zone. This buffer zone has been incorporated into the FOST in the text and figures, as appropriate. However, no edit will be made to page 4-1.
20.	Chapter 4.1.2	This section is lacking information. Please state, for each IRP site listed, whether or not they were deemed suitable for unrestricted use. If hazardous materials remain in place at levels that are not suitable for unrestricted use, a land use covenant may be required under California Code of Regulations, title 22, section 67391.1.	All property in the FOST has been determined to be suitable for residential use and no hazardous materials remain in place that would require a land use covenant. Section 1 Purpose clarifies that all property is suitable for residential use in the text, thus encompassing all IRP sites as well as all LOCs. Therefore, no change was made based on this comment.
21.	Chapter 4.1.3	The RWQCB NFA letters for UST and AST sites need to be included in this paragraph. Please provide a discussion about the NFA concurrences issued by the RWQCB.	Text has been added to indicate that NFA letters are provided in Attachment 1. Text has been added to clarify that NFA letters from OCHCA and RWQCB determined that no further action was necessary in accordance with Title 23 CCR Section 2721(e). (Change has been made on Page 4-6)
22.	Chapter 4.2.1	The number of facilities listed is not consistent with the number listed on Page 2-2 or Table 1. Please correct the inconsistencies.	The number of facilities has been reviewed and revised as appropriate to be consistent.
23.	Chapter 4.2.2	The number of facilities listed is not consistent with the number listed on Page 2-2 or Table 1. Please correct the inconsistencies.	The number of facilities has been reviewed and revised as appropriate to be consistent.
24.	Chapter 4.2.2.4	Figure 6b is incorrectly referenced. Please delete.	Reference to Figure 6b has been removed from this sentence. (Change has been made on Page 4-8)

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Comment No.	Section/ Page No.	Comment	Response
25.	Chapter 4.2.2.5	Please provide the Navy's rationale for not removing or replacing PCB T75, and whether the rationale is in line with the Navy's policy/guidelines for PCBs?	The text "with the exception of PCB T75..." has been removed. Associated notes in Table 9 and other text areas regarding PCB T75 needing to be removed have been deleted also. The note indicating the need for removal of PCB T75 is an erroneous carryover from notes in the Business Plan.  (Change has been made on Page 4-9; Table 9 is now Table 10)
26.	Chapter 4.2.2.5	The last sentence states that "no evidence of a release has been identified for any of these transformers or equipment." However, PCB T56 is listed in Table 9, and the notes state there was a "minor release of transformer oil containing PCBs" Please correct the inconsistency.	The last sentence in 4.2.2.5 is incorrect for Parcel II-A and has been deleted from the text.  (Change has been made on Page 4-9)
27.	Chapter 4.2.3	The number of facilities listed is not consistent with the number listed on Page 2-2 or Table 1. Please correct the inconsistencies.	The number of facilities has been reviewed and revised as appropriate to be consistent.
28.	Chapter 4.2.3	This chapter says that PCB-containing transformer and equipment LOCs are in Parcel III-A. However, Chapter 4.2.3.4 says that Parcel III-A has no PCB-containing transformer locations. Please correct the inconsistency.	Transfer Parcel III-A has been updated and now does not include any Non-transformer PCB Equipment (Buildings 176 and 178 are now in Carve-out III-D). Therefore, Section 4.2.3.4 has been deleted from the text.
29.	Chapter 4.2.3.4	This paragraph needs to be re-written as the first sentence is not consistent with the rest of the sentences in the paragraph. Please review the paragraph and make the necessary corrections.	Please see response to Specific Comment #28.
30.	Chapter 4.2.5	The number of facilities listed is not consistent with the number listed on Page 2-2 or Table 1. Please correct the inconsistencies.	Transfer Parcel V-A will no longer be transferred to the California Air National Guard. Consequently, this property has been merged with Transfer Parcel II-A. The number of facilities has been reviewed and revised as appropriate to be consistent.
31.	Chapter 4.2.5.1, APHO Sites	The information regarding ASTs sites was incorrectly placed here. It should be in Chapter 4.2.5.2. Please correct.	Transfer Parcel V-A will no longer be transferred to the California Air National Guard. Consequently, this property has been merged with Transfer Parcel II-A. The sentence has been corrected in Section 4.2.2.1.
32.	Chapter 4.2.5.3	In the third sentence, please change "transformers are provided" to "transformers and one item are provided".	Transfer Parcel V-A will no longer be transferred to the California Air National Guard. Consequently, this property has been merged with Transfer Parcel II-A. The sentence has been corrected in Section 4.2.2.5.

**Document Title:**

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Comment No.	Section/ Page No.	Comment	Response
33.	Chapter 5.1	<p>The text in this chapter is not consistent with the Navy's response to DTSC's Specific Comment #53. Please change Chapter 5.1 as follows:</p> <p>5.1 School Site Considerations</p> <p><u>Notifications</u></p> <p>If, subsequent to transfer, any portion of the property found suitable for transfer by this FOST is considered for the proposed acquisition and/or construction of school properties utilizing state funding, a separate environmental review process in compliance with the California Education Code section 17210 et. seq. will need to be conducted by the transferee and approved by the DTSC (School Property Evaluation and Cleanup Division). The California Education Code requires that a comprehensive evaluation of natural and manmade hazardous materials be conducted for school properties. This comprehensive evaluation requires additional investigation of hazardous materials outside the scope of CERCLA hazardous substances. This additional evaluation includes: legally applied pesticides and herbicides, imported fill materials, naturally occurring hazardous substances such as heavy metals (e.g., chromium, mercury, nickel), metalloids (e.g., arsenic, selenium), gases (e.g., methane, hydrogen sulfide), and radioactive elements (e.g., radon gas) and naturally occurring petroleum deposits. The evaluation also includes asbestos-containing materials and lead-based paint at concentrations that fall outside the scope of CERCLA. Any requirements associated with the evaluation of any property for compliance with the California Education Code are the sole responsibility of the transferee.</p>	<p>The text "it is DTSC's position that" following "utilizing state funding" in the first sentence, and "utilizing state funding" at the end of the second sentence have been deleted. The examples of gasses and radioactive elements have been added to the text.</p> <p>Chapter 5.1 has been revised to indicate School Site Considerations is a notification. Please also refer to response to Comment #3 for the February 20, 2004 cover letter.</p> <p>(Change has been made on Page 5-1)</p>
34.	Chapter 5.2, Restrictions	<p>It states that all hazardous substance LOCs within the parcels proposed for transfer have received regulatory agency concurrence of NFA decisions. However, Table 4, TAA 289 does not indicate that a regulatory agency concurrence of NFA was received for the site. Please explain.</p>	<p>DTSC provided an NFA letter for TAA 289 on October 10, 2003. This information has been added to Table 4 and the NFA letter has been added to Attachment 1.</p>

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Comment No.	Section/ Page No.	Comment	Response
35.	Chapter 5.3, Notifications, Paragraph 2	The section cited is incorrect. It should read, "4.1.2.2". Please correct.	This paragraph has been deleted and the contents moved to Attachment 2b.
36.	Chapter 5.3, Restrictions	Please refer to General Comment #5 above.	Please see response to General Comment #5.
37.	Chapter 5.6, Notifications	See Specific Comment # 25 above.	Please see response to Specific Comment #25.
38.	Chapter 5.6, Notifications, Paragraph 1, Sentence 5	The sentence states that there are no inactive PCB-containing transformers and equipment storage locations situated within the parcels proposed for transfer. However, Table 9, Parcel I-A identifies 6 PCB transformers that say no PCB releases were identified, but it doesn't say the transformer was removed or replaced. There is also 1 PCB transformer that requires removal/replacement in Parcel II-A. This seems contradictory to the above sentence. Please correct.	"Removed" has been added to the notes in Table 9 to clarify that no PCB transformers remain on FOST property. Please also refer to response to Specific Comment #25.  (Table 9 is now Table 10)
39.	Chapter 5.6, Notifications, Paragraph 1, Sentence 7	This sentence is not consistent with Table 9. Table 9 does not show any former PCB-containing transformer locations present in Transfer Parcel III-A. Please correct.	There are no PCB-containing transformers in Transfer Parcel III-A. Parcel III-A has been removed from the sentence.  (Table 9 is now Table 10)
40.	Chapter 5.6, Restrictions	See Specific Comment #26 above.	Text has been revised; please see response to Specific Comment #26.
41.	Chapter 5.8, Notifications	Several of the facilities listed here do not appear in Table 1 as they should. Please correct the inconsistencies.	Please refer to response to General Comment #2.  A statement has been added to the text to identify demolished buildings.
42.	Chapter 5.9, Notifications, Paragraph 2	Why are the transfer parcels listed in sentence 1 different than those listed in sentence 10 (i.e., II-A)?	Transfer parcels listed in the first and tenth sentences have been made consistent.
43.	Chapter 5.9, Notifications, Paragraph 2, Sentence 10	Please insert "ECP" between "considered" and "category".	"ECP" has been inserted.

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

*Reviewers: John Scandura, Chief, Office of Military Facilities, Southern California Branch, DTSC; Dated: February 20, 2004*

Comment No.	Section/ Page No.	Comment	Response
44.	Chapter 5.11, Notifications	Please summarize in which parcels ACM has been identified in buildings.	Bulleted lists containing this information were provided in Chapter 5.11 (pages 5-8 to 5-10 of the Draft Final FOST). Please also refer to responses to comments on Specific Comments # 48 and 49.
45.	Chapter 5.11, Notifications, Paragraph 1, Sentence 2	According to the surveys referenced, there were more surveys conducted than the six stated in this sentence.	The number of surveys listed correspond to six specific surveys some of which were carried out over two years.
46.	Chapter 5.11, Notifications, Paragraph 1, Sentence 3	Please ensure that all of the surveys listed are correctly cited and referenced in Chapter 9 (i.e., the citation for the 2003 survey is missing).	All historical surveys conducted have been listed. The source of the surveys is the 2003 Business Plan and the Final EBS, and has been referenced accordingly in Section 5.11 (Page 5-8). Consistent with the format for bibliography/references, the historical surveys themselves are not listed in Section 9.
47.	Chapter 5.11	There are many inconsistencies between the text and tables regarding asbestos. Please conduct a thorough review of text and tables and make the necessary corrections. An example of some of the inconsistencies are outlined directly below in Comments 48 and 49. DTSC will complete its review of this chapter when the necessary corrections have been made.	Text and tables has been reviewed and made consistent. The comments column in Table 13 has been revised based on a reevaluation of historical asbestos survey information, consistent with the a, b, c, and d categorizations in Section 5.11. (Table 13 is now Table 14)
48.	Chapter 5.11, Restrictions	(a) Facilities Containing FAD ACM – All of the buildings listed for Parcels I-A and V-A are shown in Table 13 as "No FAD ACM Found" which is contrary to the heading, "Facilities Containing FAD ACM". Please correct.	Text in Section 5.11 has been corrected to match Table 13. Furthermore, the comments column in Table 13 has been revised based on a reevaluation of historical asbestos survey information, consistent with the a, b, c, and d categorizations in Section 5.11. (Table 13 is now Table 14)
49.	Chapter 5.11, Restrictions	(c) Facilities Containing Non-FAD ACM – Many of the buildings listed for Parcel I-A are shown in Table 13 as "No ACM Found" or "No interior ACM observed" which is contrary to the heading, "Facilities Containing Non-FAD ACM". Please correct. There are also a number of buildings that, according to Table 13, should be listed here but aren't. Please correct.	Please see response to Specific Comment #48.

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

*Reviewers: John Scandura, Chief, Office of Military Facilities, Southern California Branch, DTSC; Dated: February 20, 2004*

Comment No.	Section/ Page No.	Comment	Response
50.	Chapter 5.12	DTSC had numerous comments on the draft FOST with regard to lead-based paint. The Navy responded to DTSC's comments (Attachment 4), however, the responses aren't consistent with what is presented in Chapter 5.12 of the draft final FOST. Please thoroughly review the Navy's responses to DTSC's comments on the draft FOST and incorporate those responses into the document. DTSC will complete its review of this chapter when the necessary corrections have been made.	Responses to Specific Comments #51 and 52 on the Draft FOST have been reviewed and omitted or erroneous edits to the document have been corrected.
51.	Chapter 5.13	Appropriate restrictions should be included in the event that all of the wells, slated for decommissioning, are not decommissioned prior to transfer as stated in the notification. In Chapter 7 (Right of Access and Covenant – Additional Remedial Action), the Navy is requiring access to monitoring wells in the transfer parcels that are slated for abandonment, but that may not occur until after transfer. By requiring access to these wells the Navy is acknowledging that decommissioning/abandonment may not occur until after property transfer. Please include the appropriate restrictions in this chapter (i.e., wells and their associated equipment shall not be altered, disturbed, or removed without the prior review and written approval of DON and the BCT.)	Please refer to response to General Comment #8.
52.	Chapter 7	DTSC suggests changing the title of the chapter from "Right of Access and Covenant – Additional Remedial Action" to "Right of Access and Covenants" which would more accurately reflect the contents of the chapter.	The title of this section has been revised as requested.
53.	Chapter 8	DTSC believes, based on the information available to date, that the covenants required to be made under CERCLA 120(h) are appropriate. DTSC notes that there may be potential releases that have not yet been investigated, such as lead in soil from lead-based paint on older nonresidential buildings. Please refer to Specific Comment #100, below.	Please refer to response to Specific Comment #100 below.

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

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Comment No.	Section/ Page No.	Comment	Response
54.	Chapter 9, Page 9-2, Last three references	It appears that the acronym is incorrectly used. The acronym "BCP" stands for "Base Realignment and Closure Cleanup Plan" not "Base Realignment and Closure Business Plan". Please correct.	Acronyms in referenced titles have been deleted from Section 9.
55.	Table 1	Inconsistencies still exist between this table, text, Figure 2 and Attachment 6. Please correct the inconsistencies.	Please refer to response to General Comment #2.
56.	Table 2	Please cite the appropriate reference for the BCP Guidebook and include in Section 9.	The appropriate BCP Guidebook reference has been cited and included in Section 9.
57.	Table 3	Information is missing from the "Closure Report Title/Date" column for the following sites – RFA 157, RFA 46, and RFA 96. Please include the missing information in the table.	Closure report information for RFA 157, RFA 96, and RFA 46 has been added to the table.
58.	Table 4	TAA 289 – Information is missing from the "Closure Report Title/Date" and "NFA Letter Agency/Date" columns. Please include the missing information in the table.	Please see response to Comment #34.
59.	Table 4	TAA 636 – The ECP Category is listed as an area type 6. Area type 6 is not transferable. Please review and make the necessary corrections.	TAA 636 has been corrected to an ECP area type of Category 3.
60.	Table 5	Please refer to Specific Comment #86 below.	All NFA letters have been reviewed and corrections have been made where necessary.
61.	Table 5	In Figure 3d, it appears that APHO 83 is in Parcels I-A and II-A. If APHO 83 is in both parcels, please make the appropriate change to this table.	APHO 83 is located in both I-A and II-A. Changes have been made to the table on page 18 of 20.
62.	Table 6	AST 670, USTs 66A, 94, 366, 449, 451, 883, 39 – Information is missing from the "Closure Report Title/Date" column. Please include the missing information in the table.	Closure Report information has been added for these ASTs and USTs. (Table 6 is now Table 7)
63	Table 6	UST T-2 Information is missing from the "NFA Letter Agency/Date" column. Please include the missing information in the table.	NFA Letter Agency/Date has been added for UST T-2. (Table 6 is now Table 7)



## Document Title:

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

Reviewers: John Scandura, Chief, Office of Military Facilities, Southern California Branch, DTSC; Dated: February 20, 2004

Comment No.	Section/ Page No.	Comment	Response
64.	Table 6	There are several instances where the NFA concurrence letter date in column 6 does not match the NFA concurrence letter date in column 7. Please correct the inconsistencies.	The NFA Letter Agency/Date has been verified and the columns have been made consistent.  (Table 6 is now Table 7)
65.	Table 6	AST 376 – The "Notes" are confusing and incomplete. Please correct.	Note has been revised to indicate "A release from a day tank associated with a backup generator to a concrete pad was noted during the 2002 VSI; no soil staining or release to the environment was identified."  (Table 6 is now Table 7)
66.	Table 6	UST 39 – The "Notes" are incomplete. Please correct.	The paragraph in the notes has been completed.  (Table 6 is now Table 7)
67.	Table 8	RFA 157 – Information is missing from the "Closure Report Title/Date" column. Please include the missing information in the table.	Missing information for RFA 157 has been added.  (Table 8 is now Table 9)
68.	Tables 3 – 8	<p>At the end of Tables 3 through 8 there is a new "Note", which includes 6 bullet items, that was not originally included in the Draft FOST. DTSC has comments on 5 out of 6 of the bullet items as follows:</p> <p><i>Bullet 1 states, "No further action is required as per Regulatory Agency Concurrence Letter (date listed) based on Closure Report (date listed)."</i></p> <p><b>Comment 1a:</b> There are numerous sites listed in Tables 3 through 8 where this information is missing.</p> <p><i>Bullet 2 states, "The "allowable use" is "residential"."</i></p> <p><b>Comment 1b:</b> Why are the terms "allowable use" and "residential" in quotes? Please provide definitions for the terms.</p> <p><b>Comment 2b:</b> Do any of the LOCs listed in these tables have buildings on them that have restrictions (i.e., LBP or asbestos)? The sentence stating that the allowable use is residential should also have the following qualifier, "subject to the notifications and restrictions set forth in Section 5."</p>	<p>These bullets were created in order to satisfy information found in the template table requested by DTSC (see attachment provided to the Navy by DTSC in July 2003. Please direct questions regarding the template table to Ms. Kathy San Miguel of DTSC). All NFA dates and completed closure reports have been added to the tables.</p> <p>(Tables 3 through 8 are now Tables 3 through 9)</p> <p>1b. The "allowable use" term indicates what type of reuse is allowable for the transferred property. All FOST property is suitable for residential use. Quotation marks are not necessary and have been removed.</p> <p>2b. Second and third bullet have been revised to address comment.</p>

**Document Title:**

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Comment No.	Section/ Page No.	Comment	Response
		<p><b>Comment 3b:</b> DTSC notes that the RWQCB provided No Further Action (NFA) concurrence for many of the sites included in Tables 3 through 8. The RWQCB conducts their cleanups pursuant to RCRA Subtitle I and Chapter 6.7 of the California Health and Safety Code, while DTSC conducts its cleanups under RCRA Subtitle C and Chapters 6.5 and 6.8 of the California Health and Safety Code.</p> <p><i>Bullet 3 states, "No engineering controls, institutional controls, or restrictions are required for any of the LOCs. Relevant notifications are discussed in Section 5 and summarized in Table 15a/b."</i></p> <p><b>Comment 1c:</b> Are there any buildings situated on LOC properties listed in Tables 3 through 8? If so, do any of the buildings have restrictions associated with them? If buildings with restrictions are located on LOC properties, then this bullet item needs to be re-written.</p> <p><i>Bullet 5 states, "Public outreach activities were effected through the public comment period for the FOST (April 28 to May 28, 2003) and Restoration Advisory Board meetings. Pertinent information can be found at <a href="http://www.efds.w.navy.mil/environmental/envhome.htm">www.efds.w.navy.mil/environmental/envhome.htm</a>."</i></p> <p><b>Comment 1d:</b> Until speaking with a Navy representative on January 22, 2004, DTSC was unaware of the above official public comment period for the FOST. DTSC requested a copy of the public notice that ran in the newspaper and any public comments the Navy received. DTSC received the requested information from the Navy on February 12, 2004 via electronic mail.</p> <p><i>Bullet 6 states, "The property associated with each of the sites are considered "clean parcels", as defined by DTSC for a Transfer Type 1, meaning allowable use is suitable for residential use."</i></p> <p><b>Comment 1e:</b> This bullet item is used out of context and is very confusing. DTSC suggests deleting Bullet 6. If Bullets 2 and 3 are expanded upon, there would be no</p>	<p>3b. See Navy response to Comment #2 in DTSC's February 20, 2004 cover letter and response to Specific Comment No. 15.</p> <p>1c. Buildings associated with LOCs listed in Tables 3 through 8 may have restrictions due to ACM or LBP. However, the purpose of Tables 3 through 8 is to provide information for the LOCs not their associated buildings. Since there are no restrictions required for LOCs, this bulleted statement is accurate. Restrictions due to associated buildings can be found in Section 5.</p> <p>1d. Comment noted.</p> <p>1e. This bullet has been deleted.</p>

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

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Comment No.	Section/ Page No.	Comment	Response
		need for Bullet 6. DTSC did not provide NFA concurrence on all sites listed in Tables 3 through 8.	
69.	Table 9	DTSC was unable to locate transformers PCB T25 and PCB T87 on Figures a-c. Please explain.	PCB T25 and PCB T87 have been added to Figure 7b. (Table 9 is now Table 10)
70.	Table 9	At the end of Table 9 there is a now a new "Note", which includes 5 bullet items, that was not originally included in the Draft FOST. Please refer to Specific Comment #68, above.	Please refer to response to Specific Comment #68. (Table 9 is now Table 10)
71.	Table 10	At the end of Table 10 there is a now a new "Note", which includes 5 bullet items, that was not originally included in the Draft FOST. Please refer to Specific Comment# 68, above.	Please refer to response to Specific Comment #68. (Table 10 is now Table 11)
72.	Table 11	MSC ST20B – Information is missing from the "Closure Report Title/Date" column. Please include the missing information in the table.	MSC ST20B is former IRP 20 Unit 3. Closure letter and closure report information will be added to the table. (Table 11 is now Table 12)
73.	Table 11	At the end of Table 11 there is a now a new "Note", which includes 5 bullet items, that was not originally included in the Draft FOST. Please refer to Specific Comment #68, above.	Please refer to response to Specific Comment #68. (Table 11 is now Table 12)
74.	Table 12	Please refer to Specific Comment #111 below.	Table 12 has been updated as appropriate. (Table 12 is now Table 13)
75.	Table 13	Please refer to Specific Comment #47 above.	Text and tables have been reviewed and made consistent. (Table 13 is now Table 14)
76.	Table 14	Please refer to Specific Comment #47 above.	Text and tables have been reviewed and made consistent. (Table 14 is now Table 15)
77.	Table 14	Please indicate, in the table, the parcel associated with each unit.	The table has been revised to include the transfer parcel associated with each unit. (Table 14 is now Table 15)

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

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Comment No.	Section/ Page No.	Comment	Response
78.	Table 14	Please include the appropriate source(s) for the information presented in the table and be sure to reference in Chapter 9.	The source has been added and listed in Section 9. (Table 14 is now Table 15)
79.	Tables 15a/b	Please ensure that any changes made to Section 5 are carried over to Tables 15a and b. Section 5 and Tables 15a and b should be consistent.	Tables 15a/b and Section 5 have been reviewed to maintain consistency. (Table 15a/b is now Table 16a/b)
80.	Tables 15a/b	"School Sites" should be listed as a category/column heading.	"School Sites" will be added to Table 15a, and a footnote will be added to state that this factor may be applicable to any parcel since school site locations are not currently defined. Since Table 15b is building/structure/facility specific, it is not possible to indicate where this notification may apply and would be misleading to indicate it is applicable to any or all of the facilities. Therefore, Table 15b will not be edited based on this comment. Please also refer to response to Comment #3 for the February 20, 2004 cover letter. (Table 15a/b is now Table 16a/b)
81.	Figure 2	Were buildings/structures that have been demolished or removed shown on this figure? They were not listed in Table 1.	Please refer to response to General Comment #2.
82.	Figure 2	Please refer to General Comment #2 above.	Please refer to response to General Comment #2.
83.	Figure 3d	There is a large APHO site listed in Transfer Parcel I-A that is not labeled. Please label the site.	Figure 3d incorrectly presented an area using the APHO legend, this has now been corrected.
84.	Attachment 1	It doesn't appear that all the NFA letters listed in the tables are included in this attachment. Please review Attachment 1 and the tables and make the necessary corrections.	All NFA letters have been added to Attachment 1.
85.	Attachment 1	The dates on some of the NFA letters do not match the dates on the corresponding NFA letters referenced in the tables. Please review Attachment 1 and the tables and make the necessary corrections.	Inconsistencies between the tables and Attachment 1 has been reviewed and corrected.
86.	Attachment 1	It appears that the RWQCB provided the Navy with NFA letters on many APHOs that are not reflected in Table 5. Please review Attachment 1 and the tables and make the necessary corrections.	NFA letters have been reviewed and corrections have been made where necessary.

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

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Comment No.	Section/ Page No.	Comment	Response
87.	Attachment 2a	UST 766B – Information is missing from the "Activities Conducted At Site" column. Please include the missing information.	An "S" for storage has been added to this column for UST 766B.
88.	Attachment 2b, Page 3 of 29	There is not a Transfer Parcel number I-C, however, it is listed here. Please correct.	Building 289 is located in Transfer Parcel I-A. The parcel number has been corrected.
89.	Attachment 3	Please refer to Specific Comment #2 above.	The title for Attachment 3 has been changed to "DOD Policies on Asbestos, Lead-Based Paint, and Radon at Base Realignment and Closure Properties."
90.	Attachment 4	Navy's response to DTSC's General Comments #1 and 2 – Inconsistencies still exist.	The text, tables, and figures have been reviewed to correct any inconsistencies.
91.	Attachment 4	The Navy responded to General Comments #7, 8 and 10 and Specific Comment #43 that were raised in DTSC's letter dated July 17, 2003. These comments were in regards to the Navy's RCRA corrective action obligations and no further action determinations for USTs and ASTs. Cal/EPA Secretary Terry Tamminen's response to the Assistant Secretary of the Navy's letter of January 7, 2004, which is discussed in the cover letter accompanying these comments, also addresses the above issue.	See Navy response to Comment #2 in DTSC's February 20, 2004 cover letter and response to Specific Comment No. 15.
92.	Attachment 4	Navy's response to DTSC's General Comment #9 – In the third paragraph the Navy states, "Furthermore, PRLs were generally grouped into larger carveouts, thus increasing the buffer zone available for the PRLs." This is only true if the entire carve-out is subject to restrictions. Currently, the FOSL is not set up that way.	Comment noted. Entire carve-outs in the FOSL are subject to restrictions.
93.	Attachment 4	Navy's response to DTSC's General Comments #16 and 17 – What is written in this response does not match the new text in the document. Please correct the inconsistency.	For Draft General Comment #16, the entire paragraph has been slightly modified as the original RTC had some incorrect language. Recommend reviewing 4 <sup>th</sup> paragraph of Chapter 1 in full. For Draft General Comment #17, text is most accurate as currently written.
94.	Attachment 4	Navy's response to DTSC's Specific Comments #4, 14 – What is written in this response does not match the new text in the document. Please correct the inconsistency.	Please refer to response to Specific Comment #93.

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

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Comment No.	Section/ Page No.	Comment	Response
95.	Attachment 4	Navy's response to DTSC's Specific Comment #13 – discrepancies still exist.	The text, tables, and figures have been reviewed to correct any inconsistencies.

## Document Title:

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

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Comment No.	Section/ Page No.	Comment	Response
96.	Attachment 4	Navy' response to DTSC's Specific Comment #39 – The response doesn't adequately respond to DTSC's comment. Does the Navy plan to incorporate notifications into the deed?	<p>All notifications are incorporated into deeds by reference to the FOST. By way of clarification, in stating that notifications are incorporated into deeds, the Navy is referring to the fact that its deeds contain a reference to the appropriate FOST, along with an acknowledgement that the grantee for the property in question has received a copy of the FOST and an opportunity to inspect and copy all documents referenced therein, and is aware of the notifications contained in the FOST. Certain notifications may be expressly included in deeds as appropriate, e.g., flood plain notifications, in accordance with Executive Order No. 11988, Floodplain Management, dated May 24, 1977. Other notifications are included in exhibits which are attached to and made part of the deeds, e.g., a notification regarding Site 19 will be included in the Hazardous Substance Notification for any deed encompassing all or part of Site 19, pursuant to 42 U.S.C. § 9620(h)(3)(A) and 40 C.F.R. part 373. Therefore, Attachment 2b will be revised; the "Notes" column on page 24 of Attachment 2b will be edited for Site 19 to state the same information found in the second paragraph of Chapter 5.3. Accordingly, the second paragraph of Chapter 5.3 has been deleted.</p> <p>In accordance with previous negotiations with DTSC concerning the former MCAS Tustin and DTSC's letter of February 20, 2004, the Navy will be including a notification regarding School Sites in the FOST, but will not include in or attach to its deeds a specific notification with respect to School Sites. The law concerning School Sites does not pertain to or provide information concerning actual environmental conditions per se, but instead imposes requirements with respect to any property for which certain school-related state funding is sought, regardless of the actual environmental condition of such property. Consequently, with respect to property discussed in the Navy's FOST, a deed notification based on the School Sites Considerations would not relate to, or provide information concerning, any previously- or presently-existing environmental condition(s) on such property. Furthermore, the Navy is unaware of any requirement for inclusion of such a notification in its deeds, or any authorization for such inclusion.</p> <p>Since notifications are not "binding" in nature, the Navy's deeds do not state that notifications apply to subsequent owners.</p>

**Document Title:**

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Comment No.	Section/ Page No.	Comment	Response
97.	Attachment 4	Navy's response to DTSC's Specific Comment #47 – Discrepancies still exist (i.e., Building 173 is listed in Section 5.8, but is not included in Table 1). Buildings 354 and 832 are discussed in the Navy's response as being ranges that were recommended for no further investigation. Are these buildings located on property proposed for transfer? If so, why aren't they listed in Section 5.8 of the FOST? Building 832 is listed in Section 5.8 of the FOST, but is not included in Table 1. Please explain and correct both the FOST and FOSTL as appropriate.	Building 173 and 354 are demolished buildings and therefore are not listed in Table 1. Reference to Building 354 will be added to Section 5.8 and Table 20b of the FOSTL. Please also refer to response to General Comment #2. Building 832 is an existing building and is located in Carve-out II-M of the FOSTL. This building has been added to Table 1 and the text in the FOSTL.
98.	Attachment 4	Navy's response to DTSC's Specific Comment #50 – Information in the text is still not consistent with Table 14. Please reconcile.	Discrepancies in the text and Table 14 have been corrected. Table 14 only lists buildings that are proposed for reuse (i.e. Wherry housing). Table 13 lists all buildings that have previously been surveyed.  (Tables 13 and 14 are now Tables 14 and 15, respectively)
99.	Attachment 4	Navy's response to DTSC's Specific Comment #51 - Please refer to Specific Comment #50 above.	The response to Comment #50 has been incorporated as appropriate into Section 5.12.
100.	Attachment 4	Regarding the Navy's response to DTSC's Specific Comment #52, DTSC maintains that the presence of exterior LBP that has been released to the soil poses a potential release to the environment pursuant to CERCLA as amended by SARA of 1986. DTSC continues to advise soil sampling in the vicinity of buildings constructed prior to 1978, to ensure that lead from LBP is not at levels which may pose a threat to human health and the environment. The Navy has conducted LBP evaluations at residential buildings, but has not evaluated soil-lead hazards for nonresidential buildings. Although these evaluations have not yet been conducted for nonresidential buildings, DTSC is confident that as long as the appropriate restrictions and notifications are in place, public health has been protected. DTSC spoke with the Navy on February 3, 2004 regarding these restrictions and notifications. DTSC will concur with the FOST once all LBP restrictions and notifications that were conveyed to the Navy on that date, are incorporated into the appropriate sections of the document.	Please refer to response to Specific Comment #52 on the Draft FOST.  The third sentence under "Nonresidential Structures" on page 5-11 has been added to the "Restrictions" section on page 5-12.  (Pages 5-11 and 5-12 are now pages 5-12 and 5-13, respectively)



**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

*Reviewers: John Scandura, Chief, Office of Military Facilities, Southern California Branch, DTSC; Dated: February 20, 2004*

Comment No.	Section/ Page No.	Comment	Response
101.	Attachment 4	The Navy's response to DTSC's Specific Comment #53 is not consistent with the new text. Please correct the inconsistency.	Please refer to response to Specific Comment #33.
102.	Attachment 4	Navy's response to DTSC's Specific Comment #55, paragraph 2 – The response is not consistent with what was done in the text.	The last sentence of Section 7 has been deleted. Please also refer to response to Specific Comment #51.
103.	Attachment 4	Navy's responses to DTSC's Specific Comments #58, 59, 62, 64, 65, 66, 67, 72 are not consistent with the body of the Draft Final FOST (i.e., figures/tables referenced are not correct). In the response, please refer to the new figure/table as it is referred to in the draft final version.	<p>Comments and responses to DTSC's Specific Comments #58, 59, 62, 64, 65, 66, 67 and 72 for the Draft FOST have been reviewed to verify if the responses were incorporated in the Draft Final FOST. The status of these revisions in the Draft Final FOST and, if applicable, to the next version of the FOST are presented below:</p> <p>(In the current version of the tables, an IRP Table was introduced as Table 6 causing the Table numbers to increase by one from Table 6 on.)</p> <p><b>#58 &amp; #59:</b> Figure 2 and Figure 3a of the Draft FOST were combined and presented as Figure 2 (Facilities within Transferable Parcels) of the Draft Final FOST. The title of Figure 2 has now been changed to "Buildings/Structures/ Facilities within Transferable Parcels." As shown in the Draft Final FOST, Section 1 clarifies the difference between "Transfer Parcel Number" and "Navy Sale Parcel Number. The text states "Portions of Navy Sale Parcels I, II, and III (designated as Transfer Parcels I-A, II-A, and III-A respectively) and all of Navy Sale Parcel IV (Transfer Parcel IV), have been identified as suitable for transfer."</p> <p>In accordance with RTC #59 for the Draft FOST, all non-demolished housing areas and buildings were shown on Figure 2 and Attachment 6 of the Draft Final FOST. These buildings were also listed in Table 1 under their corresponding transfer parcel. Demolished buildings were not labeled in Figure 2 or Attachment 6 and were not listed in Table 1. All buildings/structures/facilities located in transfer parcels (non-demolished and demolished) were listed in Table 16b. Furthermore, there are numerous small structures shown in yellow in Figure 2 and Attachment 6, such as sheds, stable area structures, windstocks, etc. that do not have numbers and therefore were not labeled.</p> <p><b>#62:</b> Figures 5a-5d of the Draft FOST were presented as Figure 3a-</p>

**Document Title:**

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*Reviewers: John Scandura, Chief, Office of Military Facilities, Southern California Branch, DTSC; Dated: February 20, 2004*

Comment No.	Section/ Page No.	Comment	Response
			<p>3d of the Draft Final FOST. As per RTC #62, RFA 12 and 247 are basewide sites (sanitary sewer and irrigation piping); therefore, these sites were not shown in the Figure 3 series. A note in the Figure 3 series states that these sites are basewide and are not shown.</p> <p>Table 4 of the Draft FOST was presented as Table 3 in the Draft Final FOST. As per RTC #62, RFA 12 was listed in Table 3 (RCRA Facility Assessment Sites) of the Draft Final FOST.</p> <p>As per RTC #62, APHO 14 and APHO 16 were corrected in the Draft Final FOST. Also, RFA 44 was moved to the Draft Final FOST.</p> <p><b>#64:</b> Figure 7 series and Table 7 of the Draft FOST became Figure 5 series and Table 6, respectively in the Draft Final FOST. As per RTC #64, USTs 547, 548, 549, 550, and 551 were moved to the FOST. USTs 392A-F that were part of the Draft FOST were moved to the Draft Final FOST.</p> <p>As per RTC #62, the leader line for UST 610 was adjusted.</p> <p>Correction of AST 619B to AST 619 was inadvertently omitted in the notes section of Figure 5b of the Draft Final FOST. This has been corrected in the Draft Final Rev 1 FOST. Corrections to Figure 7c of the Draft FOST regarding UST 241, AST 670, USTs 40, 41, and 42 and AST 146 were made in Figure 5c of the Draft Final FOST with the exception of adding the "(I)" for AST 146. This correction has been made in the Draft Final FOST Rev 1.</p> <p>UST 463 was presented in Table 9 and Figure 6b of the Draft Final FOST.</p> <p>AST 833 was presented in Table 6 and Figure 5a (Parcel II-A) of the Draft Final FOST.</p> <p><b>#65:</b> Figures 8a, b, &amp; c, Table 4, and Table 8 of the Draft FOST were presented as Figures 6a &amp; b, Table 3, and Table 7, respectively in the Draft Final FOST. Corrections to the referenced Figures and Tables regarding "Notes", RFA 305, and "OWS" ID were made in the Draft Final FOST.</p> <p><b>#66:</b> Figures 9b &amp; c and Table 10 of the Draft FOST were presented as Figures 8b &amp; c and Table 9 of the Draft Final FOST. Transfer Parcel # was corrected to II-A in the Draft Final FOST on Figure 7b.</p>

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

*Reviewers: John Scandura, Chief, Office of Military Facilities, Southern California Branch, DTSC; Dated: February 20, 2004*

Comment No.	Section/ Page No.	Comment	Response
			<p>PCB T135, T136, T137, T141-T146 were erroneously shown on Figure 9c and were subsequently removed in the Draft Final FOST.</p> <p>#67: Figures 10a &amp; 10b and Table 12 of the Draft FOST were presented as Figures 8a &amp; b and Table 11, respectively of the Draft Final FOST. Text has been added to the "Notes" section of Figures 8a &amp; b of the Draft Final FOST Rev 1 to identify MSC W1 and W2 as having been removed and the remaining as inactive.</p> <p>#72: Table 4 of the Draft FOST was presented as Table 3 in the Draft Final FOST. Corrections to the references, sources, RFA 44, and RFA 69 were made in the Draft Final FOST. RFA 147 was erroneously shown on Table 4 of the Draft FOST and consequently was not added to the figure. (The RTC incorrectly stated that RFA 147 has been added to Figure 5d.)</p> <p>As per RTC #72, regarding RFA 96, a sentence has been added to the "Notes" in Table 3 of the Draft Final Rev 1 FOST.</p>
104.	Attachment 4	Navy's response to DTSC's Specific Comment #69 – Please see General Comment #8 above.	There are no wells remaining on FOST property. Please refer to response to General Comment #8.
105.	Attachment 4	Navy's response to DTSC's Specific Comment #73 – It still seems as if the "Notes" for TAAs 10, 289 and 441 are incomplete and inconsistent with the "ECP Category" listed and also possibly inconsistent with the statement that "the allowable use" is "residential." Please review the "Notes" and the "ECP Category" and make any necessary changes.	The notes for TAAs 10, 289, and 441 have been reviewed and clarified as appropriate.
106.	Attachment 4	Navy's response to DTSC's Specific Comment #74, Paragraph 6 states that APHO 4 is in Parcel V-A. Figure 3a still shows APHO 4 in Parcels V-A and II-A. Please correct the figure.	<p>APHO 4 is located in Parcel II-A and V-A. The table has been corrected to include this.</p> <p>Transfer Parcel V-A will no longer be transferred to the California Air National Guard. Consequently, this property has been merged with Transfer Parcel II-A. Therefore, APHO 4 is located in Transfer Parcel II-A and the text and tables have been updated to reflect this.</p>

**Document Title:**

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*Reviewers: John Scandura, Chief, Office of Military Facilities, Southern California Branch, DTSC; Dated: February 20, 2004*

Comment No.	Section/ Page No.	Comment	Response
107.	Attachment 4	Navy's response to DTSC's Specific Comment #74, Paragraph 8 states that APHO 110 is in Parcel II-A and that the figure location has been adjusted. However, APHO 110 is not listed in Table 5 and is not included on the corresponding figure. Please explain.	APHO 110 has been moved to the FOSL, Carve-out II-E.
108.	Attachment 4	Navy's response to DTSC's Specific Comment #75, Paragraph 6 states that a note has been added to the UST/AST table regarding SWMU identifiers. The note was not included. Please include.	The following note has been added to the table; "Some tanks were given an SWMU identifier during the RFA, although these designations may not have been appropriate for some LOCs."  (Change has been made to Table 7)
109.	Attachment 4	Navy's response to DTSC's Specific Comment #77, Paragraph 3 states that the septic tank at RFA 305 is not associated with a wash rack; therefore, it is not included in Table 9 but is included in Table 3 (RFA Sites). Currently, RFA 305 and RFA 306 are shown on Figure 6b and Figure 3d, but only appear in Table 3 and not Table 8. It is confusing to have the sites appear in two figures, but only one table. Please rectify.	RFA 305 and 306 are septic tanks and named as "Wastewater Treatment and Related System LOCs". Because these RFAs are not wash racks they are not listed in Table 9, and are only listed in Table 3 which shows all transferable RFAs. RFA 305 and 306 are shown in Figure 3d because all transferable RFAs are shown in this figure series. They are also shown in Figure 6b because all Wastewater Treatment and Related System LOCs are shown in this figure series. However, the following note has been added to Figure 6b; "Information regarding septic tanks (RFA 305 and RFA 306) is provided in Table 3."  (Table 8 is now Table 9)
110.	Attachment 4	DTSC's Specific Comment #78, Paragraphs 6 and 10 have not been properly addressed. Please address.	Para 6 – Please refer to response to Specific Comment #38.  Para 7 – ECP Type in Draft Final FOST is listed (Type 1).  Para 8 – Table is correct in Draft Final FOST (reference to Parcel V-A was correct).  Para 9 – Table and figures for PCBs T064, T065, and T102 are correct and consistent.  Para 10 – Please refer to response to Specific Comment # 25.  (Transfer Parcel V-A will no longer be transferred to the California Air National Guard. Consequently, this property has been merged with Transfer Parcel II-A.)

**Document Title:**

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Comment No.	Section/ Page No.	Comment	Response
111.	Attachment 4	<p>Navy's response to DTSC's Specific Comment #81 - DTSC understands that the Navy must make the CERCLA 120(h)(3) covenant in a deed transferring property on which any hazardous substance was stored for one year or more or known to have been released or disposed of. In order to make a finding of suitability to transfer, the Navy/BCT should locate and review all documents necessary for assessing the current environmental condition of the real property to be transferred. Such documents include, but are not limited to, the EBS required under CERFA; reports of studies conducted under the IRP, CERCLA, or RCRA; compliance and inspection records of the installation; records in the possession of the regulatory agencies; records concerning USTs; and reports of asbestos, lead-based paint, radon, polychlorinated biphenyls and radiological surveys. (<i>DoD Guidance on the Environmental Review Process to Reach a Finding of Suitability to Transfer (FOST) for Property Where Release or Disposal Has Occurred</i>) Also, USEPA has a FOST/FOSL checklist (Draft) that includes environmental findings that are both CERCLA and non-CERCLA related.</p> <p>The Navy's response states that the table has been updated to include radiological surveys in accordance with the BRIM. The table does not reflect this addition.</p> <p>There is a notification in Section 5.0 for School Site Considerations and Radon. This is not accurately reflected in the table. Please change "no" to "yes" regarding "School Considerations" and "Radon".</p>	<p>The Navy has reviewed necessary documents to ascertain the environmental condition of the property. Please refer to Navy response to Specific Comment No. 15 as it pertains to UST records.</p> <p>Table 12 has been updated to include radiological surveys. Note that all radiological sites identified at former MCAS El Toro are included in the FOSL.</p> <p>For School Site Considerations, changes will be made to Table 12 as requested. Please also refer to responses to Comment #3 of the February 20, 2004 cover letter and Specific Comments #33 and #80.</p> <p>(Table 12 is now Table 13)</p>
112.	Attachment 4	<p>Navy's response to DTSC's Specific Comment #82 – Discrepancies still exist between text and tables with regard to asbestos. Please make the necessary corrections.</p>	<p>The text and Tables 13 and 14 has been reviewed and made consistent.</p> <p>(Tables 13 and 14 are now Tables 14 and 15)</p>

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, November 2003

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Comment No.	Section/ Page No.	Comment	Response
113.	Attachment 5	Please be sure to discuss with DTSC, which comments are to be included in this attachment for the Final FOST.	Unresolved comments will be discussed prior to finalizing the FOST.
114.	Attachment 6	Please include IRP Site 2, its groundwater plume and an associated buffer zone. Please also identify the areas of potential soil contamination (as shown in Figure 5b, Draft Final FOSTL).	Please refer to response to General Comment # 6.  Attachment 6 has been revised to include the Site 2 plume boundary and associated buffer zone. Soil contamination in the FOSTL areas is unrelated to the FOST and will not be added to the attachment.
115.	Attachment 6	Please refer to General Comment #1 above.	Please see response to General Comment #1 above.
116.	Attachment 6	In looking at this attachment, it appears that IRP Site 13 is partially in Transfer Parcel III-A. If so, IRP Site 13 should be thoroughly discussed in this FOST.	Within the area of IRP Site 13 is UST 765A and OWS 765B that are both Category 5 (Carve-out III-B). The rest of IRP Site 13 is within Parcel III-A. Therefore, IRP Site 13 will be discussed in both the FOST and FOSTL.
117.	Attachment 6	There is a discrepancy regarding how IRP Site 3 is depicted in this attachment versus Figure 5a in the FOSTL. Please correct the discrepancy.	In, Figure 5a of the FOSTL, a label was added to the small portion of IRP Site 3 within Carve-out II-D.
118.	Attachment 6	Please refer to General Comment #2 above.	Please see response to General Comment #2 above.
119.	Attachment 7	This attachment contains a number of letters and other documents the Navy cites as support for the Navy's position regarding the RCRA Part B permit and Subtitle C Corrective Action (Section 3.2). Please refer to Specific Comments #11-15 above. Additionally, please refer to Cal/EPA Secretary Tamminen's response to the Assistant Secretary of the Navy's January 7, 2004 letter regarding RCRA corrective action termination obligations for a discussion of DTSC's response to the Navy's position.	See Navy response to Comment #2 in DTSC's February 20, 2004 cover letter and responses to Specific Comment Nos. 11-15, 91, and 111. The Navy will be adding the Navy's January 7, 2004 letter to Secretary Tamminen as well as DTSC's and EPA's response letters to Attachment 7.

**Document Title:**

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Comment No.	Section/ Page No.	Comment	Response
120.  (sent via e-mail 3/30/04)	Table 3	Upon review of the RCRA Facility Assessment (RFA) and the FOST, especially Table 3 and Figures 3a through 3d, RFA sites 3, 22, 26, 33, 48, 49, 57, 59, 65, 124, 137, 138, 139, 179, 186, 220, 248, 249, 271, 277, 278, 279, 280, 286, 287, and 298 appear to be within the boundaries of the property proposed for transfer, but they are not listed in Table 3 or found in Figures 3a through 3d. Please explain.	<p>The RFA was an initial assessment that was conducted to identify Solid Waste Management Units (SWMUs) when MCAS El Toro was operational. The SWMUs included various categories such as USTs, ASTs, TAAs, OWS, etc. However, it did not address all units within each category or for that matter all possible categories. The RFA identified 305 SWMUs (also called Areas of Concern [AOCs]) and was subsequently documented as follows in the Business Plan with the concurrence of the FFA Signatories including DTSC:</p> <ul style="list-style-type: none"> <li>• 3 were located at MCAS Tustin</li> <li>• 15 were duplicates</li> <li>• 4 were phantom sites</li> </ul> <p>Of the remaining 283,</p> <ul style="list-style-type: none"> <li>• 8 were addressed in the IRP</li> <li>• 1 addressed as PCB LOC</li> <li>• 76 addressed as UST LOCs</li> <li>• 30 addressed as OWS LOCs</li> <li>• 66 addressed as TAA LOCs, and</li> <li>• 102 addressed as RFA LOCs.</li> </ul> <p>Of the 102 LOCs, 9 were deleted as phantom or non-existent during 2002, leaving 93 RFA LOCs.</p> <p>Footnote to the RFA table (Table 4-2) in the Final EBS provides this status.</p> <p>Consequently, the RFA LOCs only include those remaining SWMUs that were not addressed as different categories of LOCs. Please note that the RFA label for these LOCs was designated only subsequent to considering them as LOCs. Reference to RFA sites 3, 22, etc. in this comment were never designated as RFA 3, RFA 22, etc. but only retained their initial designation of SWMU/AOC 3, SWMU/AOC 22, etc. Accordingly, it was not included in the EBS RFA Table as an LOC and consequently CANNOT be included in the FOST or FOSL either. However, the IRP, PCB, UST, OWS, and TAA LOC tables list the prior SWMU designation already (these tables have been checked to ensure this).</p> <p>Appendix A to these RTCs is a table that shows the cross references to the RFA sites listed with other existing LOCs; some have been closed out and some are still open and included in the FOSL.</p>

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Comment No.	Section/ Page No.	Comment	Response
121.  (sent via e-mail 3/30/04)		DTSC provided follow up comments for each RFA site listed in their original comment. The DTSC comments were specific for each RFA site. However, these comments can be summarized as follows: For each RFA site listed in DTSC's original comment, clarify if the site is found within FOST property. Also, please update the associated text in the FOST as well as FOST Table 3 to reflect historical names and mark the appropriate FOST figures. Additionally, in cases where the site was renamed and addressed under a different program, please include a reference to the RFA site in the associated FOST table to reflect the historical RFA site name. Also please update the notes for each table and include NFA information if and when appropriate. If any RFA site is found within FOST property and NFA information is not available or NFA has not been achieved, please explain.	Appendix A presents DTSC's follow up comments for each of the RFA (SWMU) sites along with the current status, including its location in FOST (Transfer Parcel) or FOSL (Carve-out) property. For the 26 SWMU's listed in comment #120, 9 were verified to be in FOST property with complete NFA information (the remaining 17 are in FOSL property of which some are FA and some are NFA). Please see RTC #120 regarding the historical background of the RFA study, SWMU/AOC identification, and designation of RFA LOCs. In this context, a footnote has been added to the RFA Tables in both the FOST and FOSL to indicate the breakdown of the originally identified 305 SWMU sites and subsequent designation of RFA LOCs. Additionally, it has been verified to ensure that those LOCs which had a former SWMU designation have been indicated such in their respective tables. A footnote has also been added to these tables to explain the SWMU designation. All LOCs (including RFA LOCs) in the FOST have achieved NFA status with regulatory concurrence and NFA information (NFA letter agency/date) is presented in the respective LOC tables and Attachment 1.



## APPENDIX A

### **Response to DTSC Inquiry (email dated March 30, 2004 from Kathy SanMiguel) on RCRA Facility Assessment (RFA) Solid Waste Management Units (SWMUs)**

#### General Response to DTSC Comments below for each SWMU

Of the total of 26 SWMUs listed by DTSC, 4 require Further Action and are all located in FOSL property. The remaining 22 have regulatory No Further Action concurrence. The location of the SWMUs in either the FOST (Transfer Parcels I-A, II-A, and III-A) or FOSL (respective Carve-outs) property is indicated in the text of the 'Status' column.

As indicated in Response to Comment (RTC) # 120 from DTSC on the Draft Final FOST (Nov. 2003), it has been verified to ensure that those LOCs which had a former SWMU designation have been indicated such in their respective tables. A footnote has been added to the RFA Tables in both the FOST and FOSL to indicate the breakdown of the originally identified 305 SWMU sites and subsequent designation of RFA LOCs. Please see RTC #120 for the historical background of the RFA study, the background information, and the RFA LOC designation.

<b>Site Identifier</b>	<b>Description/DTSC Comment</b>	<b>Status</b>
<b>SWMU 3</b>	Marshburn Channel/ Please update FOST associated text (e.g. section 4.1.2.4) as well as Table 3 (and include in IRP table) and mark appropriate figures.	Soil samples were collected at SWMU 3 during the RFA Sampling Visit (JEG 1993). The site was further evaluated with the major drainage channels under Installation Restoration Program (IRP) Site 25 which included Marshburn Channel, Borrego Canyon Wash, Agua Chinon Wash, and Bee Canyon Wash.  IRP Site 25 associated with FOST and FOSL property. (Navy Sale Parcels I, II, and III)
<b>SWMU 22</b>	Underground Storage Tank/ Please update FOST associated text as well as Table 3 and 6 and mark appropriate figures.	SWMU 22 corresponds to UST T-8. UST T-8 was removed in February 2000 with Orange County Health Care Agency (OCHCA) oversight, and the site was closed by OCHCA on 26 July 2000.  UST T-8 associated with FOSL property. (Carve-out II-Q)
<b>SWMU 26</b>	Hazardous Waste Storage Area/ Please clarify if within FOST property.	SWMU 26 is equivalent to Temporary Accumulation Area (TAA) 5B. Soil samples were collected at SWMU 26 during the RFA Sampling Visit (JEG 1993). TAA 5B was taken out of service in approximately 1998, and the site is scheduled for additional evaluation and sampling.

## APPENDIX A

Response to DTSC Inquiry (email dated March 30, 2004 from Kathy SanMiguel) on RCRA Facility Assessment (RFA) Solid Waste Management Units (SWMUs)

Site Identifier	Description/DTSC Comment	Status
		TAA 5B associated with FOSL property. (Carve-out I-F)
SWMU 33	Hazardous Waste Storage Area/ Please clarify if within FOST property.	SWMU 33 is equivalent to Temporary Accumulation Area (TAA) 51. Soil samples were collected during the RFA Sampling Visit (JEG 1993). TAA 51 was taken out of service in approximately 1998, and the site is scheduled for additional evaluation and sampling.  TAA 51 associated with FOSL property. (Carve-out I-H)
SWMU 48	Underground Storage Tank/ Please update associated text and also Table 3 and notes in Table 6 to reflect historical names and mark appropriate figures.	SWMU 48 and SWMU 49 correspond to former Underground Storage Tank (UST) 178 and former UST 179 at the Former Tank Farm 2 facility. All nine underground storage tanks were removed from Tank Farm 2 in 1995 with oversight by Orange County Health Care Agency (OCHCA). Soil vapor extraction (SVE) treatment was used during 1996 and 1997 to remove approximately 78,000 pounds of petroleum hydrocarbons from the vadose zone. A site assessment was submitted to the Regional Water Quality Control Board (RWQCB), Santa Ana Region, and the RWQCB concurred with no further action for the vadose zone on 27 March 2000.  UST 178 and UST 179 associated with FOSL property. (Carve-out III-D)
SWMU 49	Underground Storage Tank/ Please update associated text and also Table 3 and notes in Table 6 and mark appropriate figures.	See Status of SWMU 48
SWMU 57	Underground Storage Tank/ Please update associated text and also Table 3 and notes in Table 6 to reflect historical names and mark appropriate figures.	SWMU 57 and SWMU 59 correspond to UST 189 and UST 191 at former Tank Farm 3. Soil samples were collected at SWMU 57 and SWMU 59 during the RFA Sampling Visit (JEG 1993). All tanks were removed from former Tank Farm 3 with oversight by OCHCA during 1996, and OCHCA closed the sites on 13

## APPENDIX A

Response to DTSC Inquiry (email dated March 30, 2004 from Kathy SanMiguel) on RCRA Facility Assessment (RFA) Solid Waste Management Units (SWMUs)

Site Identifier	Description/DTSC Comment	Status
		November 1996.  UST 189 and UST 191 associated with FOST property. (Transfer Parcel I-A)
SWMU 59	Underground Storage Tank/ Please update associated text and also Table 3 and notes in Table 6 to reflect historical names and mark appropriate figures.	See Status of SWMU 59.
SWMU 65	Underground Storage Tank/ Please update associated text as well as Table 3 and 6 and mark appropriate figures.	SWMU 65 corresponds to UST 240B (and the adjacent SWMU 66 that corresponds to Oil/Water Separator (OWS) 240C) were removed with OCHCA oversight. A site assessment was conducted for the RWQCB, and the RWQCB concurred with no further action on 4 February 1999.  UST 240B and OWS 240C associated with FOSL property. (Carve-out III-C)
SWMU 124	Hazardous Waste Storage Area/ Please update associated text as well as Table 3 and 4 and mark appropriate figures.	SWMU 124 corresponds to TAA 392A. Soil samples were collected during the RFA Sampling Visit (JEG 1993). Soil samples were collected following operational closure, and a closure report was submitted to DTSC. DTSC concurred with no further action on 10 March 2003.  TAA 392A associated with FOSL property. (Carve-out II-I)
SWMU 137	Oil/Water Separator/ Please update associated text as well as Table 3 and 7 and mark appropriate figures.	SWMU 137 corresponds to OWS 461A. Soil samples were collected at SWMU 137 during the RFA Sampling Visit (JEG 1993). OWS 461A and the adjacent UST 461B were closed in place with OCHCA oversight. OCHCA closed the tank sites on 27 September 1999. The RWQCB concurred with NFA for OWS 461A on 28 September 2000.  OWS 461A and UST 461B associated with FOSL property. (Carve-out II-S)
SWMU 138	Drum Storage Area/	SWMU 138 corresponds to TAA 461.

## APPENDIX A

Response to DTSC Inquiry (email dated March 30, 2004 from Kathy SanMiguel) on RCRA Facility Assessment (RFA) Solid Waste Management Units (SWMUs)

Site Identifier	Description/DTSC Comment	Status
	Please update associated text as well as Table 3 and 4 and mark appropriate figures. Include NFA information if appropriate and/or clarify if within FOST property.	Soil samples were collected during the RFA Sampling Visit (JEG 1993). Additional samples were collected following operational closure of TAA 461, and a closure report was submitted to DTSC on 22 October 2003.  TAA 461 associated with FOSL property. (Carve-out II-S)
SWMU 139	Oil/Water Separator/ Please update associated text as well as Table 3 and 7 and mark appropriate figures.	SWMU 139 corresponds to OWS 462A. Soil samples were collected at SWMU 139 during the RFA Sampling Visit (JEG 1993). OWS 462A and the adjacent UST 462B were closed in place with OCHCA oversight. OCHCA closed the site on 27 September 1999.  OWS 462A and UST 462B associated with FOSL property. (Carve-out II-S)
SWMU 179	Oil/Water Separator/ Please update associated text as well as Table 3 and 7 and mark appropriate figures.	SWMU 179 corresponds to OWS 673A. Soil samples were collected during the RFA Sampling Visit (JEG 1993). The OWS was closed in place, and additional soil samples were collected following operational closure of the OWS. The RWQCB concurred with no further action on 17 January 2001.  OWS 673A associated with FOSL property. (Carve-out II-M)
SWMU 186	Hazardous Waste Storage Area/ Please update associated text as well as Table 3 and 4 and mark appropriate figures. Include NFA information if appropriate and/or clarify if within FOST property.	SWMU 186 corresponds to TAA 673 that was taken out of service in approximately 1998. Soil samples were collected at SWMU 186 during the RFA (JEG 1993). Soil samples were collected in 2003 and a screening risk evaluated was conducted. The closure report was submitted to DTSC on 23 May 2003.  TAA 673 associated with FOSL property. (Carve-out II-M)
SWMU 220	Oil/Water Separator/ Please update associated text as well as Table 3 re: SWMU 220	SWMU 220 corresponds to OWS 766A, and the adjacent SWMU 221 corresponds to UST 766B. Soil samples were

## APPENDIX A

Response to DTSC Inquiry (email dated March 30, 2004 from Kathy SanMiguel) on RCRA Facility Assessment (RFA) Solid Waste Management Units (SWMUs)

Site Identifier	Description/DTSC Comment	Status
	and 221 and Table 6 re: SWMU 221 and mark appropriate figures. Include NFA information if appropriate and/or clarify if within FOST property.	collected during the RFA Sampling Visit. OWS 766A and UST 766B were removed with OCHCA oversight in 1998, and OCHCA closed the sites on 26 April 1999.  OWS 766A and UST 766B associated with FOST property. (Transfer Parcel I-A)
SWMU 248	Oil/Water Separator/ Please update associated text as well as Table 3 and 7 and mark appropriate figures.	During the RFA, SWMU248 was identified as an oil-water separator and SWMU 249 was identified as an underground storage tank. This was based on the consideration that a separate UST was connected to the OWS. However, historical documentation identifies that an oil reservoir existed within the OWS unit and that there was no separate UST at this location. Based on these reviews, SWMU 248 and SWMU 249 were subsequently designated as an LOC and investigated as OWS 845.  Soil samples were collected from SWMU 248 and SWMU 249 during the RFA Sampling Visit (JEG 1993). Site assessment activities were conducted. The RWQCB concurred with no further action on 20 October 2003. DTSC concurred with no further action on 23 March 2004.  Please note that UST 463 (associated with Building 463), which is proximal to OWS 845, was incorrectly associated with SWMU 249. This association has now been corrected.  OWS 845 associated with FOSL property. (Carve-out II-S)
SWMU 249	Underground Storage Tank/ Please update text as well as Table 3 and 7 and mark figures.	See Status of SWMU 248.

## APPENDIX A

Response to DTSC Inquiry (email dated March 30, 2004 from Kathy SanMiguel) on RCRA Facility Assessment (RFA) Solid Waste Management Units (SWMUs)

Site Identifier	Description/DTSC Comment	Status
SWMU 271	Hazardous Waste Storage Area/ Please update associated text as well as Table 3 and 4 and mark appropriate figures.	SWMU 271 corresponds to TAA 392B. Soil samples were collected at SWMU 271 during the RFA Sampling Visit (JEG 1993). Soil samples were collected following operational closure of the TAA, and a closure report was submitted to DTSC. DTSC concurred with no further action on 10 March 2003.  TAA 392B associated with FOSL property. (Carve-out II-I)
SWMU 277	Underground Storage Tank/ Please update associated text as well as Table 3 and mark appropriate figures.	SWMU 277, SWMU 278, SWMU 279, and SWMU 280 correspond to UST 188, UST 190, UST 193, and UST 195 at former Tank Farm 3. All tanks were removed from former Tank Farm 3 with oversight by OCHCA during 1996, and OCHCA closed the sites on 13 November 1996.  UST 188, UST 190, UST 193, and UST 195 associated with FOST property. (Transfer Parcel I-A)
SWMU 278	Underground Storage Tank/ Please update associated text as well as Table 3 and mark appropriate figures.	See Status for SWMU 277.
SWMU 279	Underground Storage Tank/ Please update associated text as well as Table 3 and mark appropriate figures.	See Status for SWMU 277.
SWMU 280	Underground Storage Tank/ Please update associated text as well as Table 3 and mark appropriate figures.	See Status for SWMU 277.
SWMU 286	Underground Storage Tank/ Please update associated text as well as Table 3 and mark appropriate figures.	SWMU 286 and SWMU 287 correspond to UST 733B and UST 733C. Soil samples were collected during the RFA Sampling Visit (JEG 1993). The tanks were removed in 1993 with OCHCA oversight, and OCHCA closed the sites on 9 December 1996.  UST 733B and UST 733C associated

## APPENDIX A

Response to DTSC Inquiry (email dated March 30, 2004 from Kathy SanMiguel) on RCRA Facility Assessment (RFA) Solid Waste Management Units (SWMUs)

Site Identifier	Description/DTSC Comment	Status
		with FOST property. (Transfer Parcel I-A)
SWMU 287	Underground Storage Tank/ Please update associated text as well as Table 3 and mark appropriate figures.	See Status for SWMU 287.
SWMU 298	Underground Storage Tank/ Please update associated text as well as Table 3 and 6 and mark appropriate figures. Include NFA information if appropriate and/or clarify if within FOST property.	SWMU 298 corresponds to UST 392A. Soil samples were collected at SWMU 298 during the RFA Sampling Visit (JEG 1993). UST 392A was removed in 1993 with OCHCA oversight, and OCHCA closed the site on 9 December 1996.  UST 392A associated with FOST property. (Carve-out II-I)

### Sources of Information

Various letters of concurrence on no further action or site closure from the California Department of Toxic Substances Control (DTSC), the Regional Water Quality Control Board (RWQCB), Santa Ana Region, and the Orange County Health Care Agency (OCHCA). Provided in Attachment 1 of this document.

Various BRAC Business Plan updates for Former MCAS El Toro. Listed in Section 9 of this document.

Jacobs Engineering Group. 1993. Marine Corps Air Station, El Toro, El Toro, California, Installation Restoration Program, Final Resource Conservation and Recovery Act Facility Assessment Report. July. [Navy Contract N68711-89-D-9296, CTO 193]. Listed in Section 9 of this document.

**Response to Comments on the Draft Final Revision 2 FOST**



**Document Title:**

- (1) Draft Final Revision 2, Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, May 2004  
 (2) Draft Final Revision 2, Finding of Suitability to Lease (FOSL), Former Marine Corps Air Station, El Toro, CA, May 2004

*Reviewers: Nicole Moutoux, Project Manager, Federal Facilities Cleanup Branch, U.S.EPA, Region IX; Dated: June 17, 2004*

Comment No.	Section/ Page No.	Comment	Response
FOSL			
1.		After numerous discussions, the regulatory agencies and the Navy came to agreement on appropriate buffer zones for IRP Sites 3 and 5 and Anomaly Area 3. These buffer zones are accurately represented in the FOSL, however, the Navy agreed to send the FFA signatories a letter memorializing the decision and associated rationale for the buffer zones. The intent of the letter was to clearly document the reasons for the buffer zones and commit the Navy to including the buffer zones and landfill gas collection systems in the Record of Decisions when they are issued for these sites. It is important that this letter be sent and concurred upon by the FFA signatories prior to finalizing the FOSL.	A letter formally documenting the proposed engineering and institutional controls pertaining to landfill gas control measures at Installation Restoration Program (IRP) Site 3 (Original Station Landfill), IRP Site 5 (Perimeter Road Landfill), and Anomaly Area 3 at the former Marine Corps Air Station (MCAS) El Toro was provided to the Federal Facility Agreement (FFA) signatories on June 24, 2004. The proposed engineering and institutional controls were based on the results of landfill gas investigations at the three sites, anticipated postclosure land use, the Navy's consultation with representatives of the California Integrated Waste Management Board (CIWMB) and California Department of Toxic Substances Control (DTSC) at a meeting on December 4, 2003, and subsequent discussions with CIWMB and fellow FFA representatives via e-mail, letter, telephone conferences on February 5 and 18, 2004, and a Base Realignment and Closure (BRAC) Cleanup Team (BCT) meeting on April 1, 2004. This letter documents previous agreements with the FFA signatories and additional concurrence on this letter is not necessary in order to complete the Final FOSL.
FOSL and FOST			
1.		Since the state of California's public health goal has recently been set at 6 parts per billion for perchlorate, EPA recommends including notification in the FOST and FOSL for those parcels where perchlorate has been detected above this level. While providing this information in a fact sheet and on the public sale website is a good way to convey the information, in the interest of providing full environmental disclosure in one place, it seems that such notification is best placed in the FOST and FOSL.	The Navy will provide a fact sheet that includes information on perchlorate detections at Former MCAS El Toro as part of the due diligence material for public sale. The fact sheet will also be posted on the public sale website. Relevant perchlorate information provided in the Final Environmental Baseline Survey (EBS) on pages 4-8 and 4-9 will also be included as part of the fact sheet. Additionally, the EBS and other supporting environmental documents are available for public review at both the Administrative Record and Information Repository locations. This disclosure fully meets the intent of providing a notification in the Finding of Suitability to Transfer (FOST) or Finding of Suitability to Lease (FOSL), which is to notify the public of perchlorate detections on FOST/FOSL property.

**Document Title:**

- (1) Draft Final Revision 2, Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, June 2004  
(2) Draft Final Revision 2, Finding of Suitability to Lease (FOSL), Former Marine Corps Air Station, El Toro, CA, June 2004

*Reviewers: Nicole Moutoux, Project Manager, Federal Facilities Cleanup Branch, U.S.EPA, Region IX; Dated: July 13, 2004*

Comment No.	Section/ Page No.	Comment	Response
GENERAL COMMENTS			
1.		<p>EPA has reviewed the Navy's response to EPA's comments on the Draft Final Finding of Suitability to Transfer and Draft Final Finding of Suitability to Lease sent via e-mail on June 28, 2004. The two issues raised in our comments were with regards to appropriate notification for perchlorate detections found in groundwater beneath the base and receipt and review of buffer zone decisions and future commitments for Landfill Sites 3 and 5 and Anomaly Area 3.</p> <p>While EPA still believes that the appropriate location for the perchlorate notification is in the FOST and FOSL documents themselves, we concur that providing notification to the public via a fact sheet is acceptable. We would appreciate the opportunity to review the fact sheet prior to distribution.</p> <p>We have also reviewed the letter from the Navy dated June 24, 2004 which describes landfill gas control measures and institutional controls to be implemented at Landfills 3 and 5 and Anomaly Area 3. The letter indicates that the activities described will be contained in subsequent CERCLA documents that will be subject to approval by FFA signatories. We concur with the actions described in the letter.</p> <p>As these were the only remaining EPA comments on the FOSL and FOST, EPA has no unresolved comments to be included in the final documents. We look forward to completing this process in order to support future development and reuse of the former MCAS El Toro.</p>	<p>The Navy appreciates your concurrence with the Finding of Suitability to Transfer (FOST) and Finding of Suitability to Lease (FOSL), with no unresolved comments, as documented in your letter dated July 13, 2004. The dedication by your agency in helping to complete this document, and the expertise presented by your staff, have greatly assisted in meeting our mutual goals of being protective of human health and the environment.</p>

**Document Titles:**

(1) Draft Final Revision 2, Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, May 2004

Reviewer: John Scandura, Chief, Office of Military Facilities, Southern California Operations Branch DTSC. Dated: June 17, 2004

Comment No.	Section/ Page No.	Comment	Response
GENERAL COMMENTS			
1.		Perchlorate in groundwater at El Toro, underlying the property proposed for transfer, ranges in concentration up to 20 parts per billion (ppb), which is above the Public Health Goal of 6 ppb. Please include a notification for perchlorate.	<p>The Navy will provide a fact sheet that includes information on perchlorate detections at Former MCAS El Toro as part of the due diligence material for public sale. The fact sheet will also be posted on the public sale website. Relevant perchlorate information provided in the Final Environmental Baseline Survey (EBS) on pages 4-8 and 4-9 will also be included as part of the fact sheet. Additionally, the EBS and other supporting environmental documents are available for public review at both the Administrative Record and Information Repository locations. This disclosure fully meets the intent of providing a notification in the Finding of Suitability to Transfer (FOST) or Finding of Suitability to Lease (FOSL), which is to notify the public of perchlorate detections on FOST/FOSL property.</p> <p>Please note this fact sheet does not qualify as either a primary or secondary document pursuant to the Federal Facility Agreement (FFA). The Navy will provide the FFA signatories with an opportunity to review and comment on the Fact Sheet: if the parties cannot agree, any differing positions will be clearly articulated in the fact sheet. The fact sheet and Final FOST are on separate schedules. The fact sheet is anticipated to be completed to coincide with the Invitation for Bids.</p>
2.		Regulatory agencies have yet to receive a formal Navy proposal for a passive/active remediation system to be installed as part of the landfill cap design to account for the reduced buffer zones around landfill Sites 3 & 5 and Aerial Photo Anomaly 3. A formal written proposal must be received by the regulatory agencies prior to the Final FOST.	<p>A letter formally documenting the proposed engineering and institutional controls pertaining to landfill gas control measures at Installation Restoration Program (IRP) Site 3 (Original Station Landfill), IRP Site 5 (Perimeter Road Landfill), and Anomaly Area 3 at the former Marine Corps Air Station (MCAS) El Toro was provided to the Federal Facility Agreement (FFA) signatories on June 24, 2004. The proposed engineering and institutional controls were based on the results of landfill gas investigations at the three sites, anticipated postclosure land use, the Navy's consultation with representatives of the California Integrated Waste Management Board (CIWMB) and California Department of Toxic Substances Control (DTSC) at a meeting on December 4, 2003, and subsequent discussions with CIWMB and fellow FFA signatories via e-mail, letter, telephone conferences on February 5 and 18, 2004,</p>

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Comment No.	Section/ Page No.	Comment	Response
			<p>and a Base Realignment and Closure (BRAC) Cleanup Team (BCT) meeting on April 1, 2004. To reiterate, the proposed engineering and institutional controls will be incorporated into the appropriate Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) documents (e.g., FS Addendum and revised Draft Proposed Plan for IRP Sites 3 and 5) for review and comment by fellow FFA signatories, as well as the California Integrated Waste Management (CIWMB).</p> <p>Subsequent to submission of the June 24, 2004 Navy letter, Department of Toxic Substances Control (DTSC) and CIWMB requested additional clarification. The Navy responded to the DTSC and CIWMB in a letter dated July 14, 2004. The aforementioned letter addressed documentation of all remaining landfill gas control issues pertaining to IRP Sites 3, IRP Site 5 and Anomaly 3. These letters document previous agreements with the FFA signatories and additional concurrence on this letter is not necessary in order to complete the Final FOST.</p>

**SPECIFIC COMMENTS**

1.	Section 3	<p>The following comment was sent to the Navy via electronic mail on May 25, 2004 and specifically concerns Section 3 of the FOST:</p> <p>DTSC's Specific Comments 11, 14, 15, 68 (3b) on the Draft Final FOST (November 2003): These comments concern the regulatory standards used by various agencies to determine whether cleanup or corrective action is completed and No Further Action is appropriate. DTSC continues to maintain that even though the various standards used by regulatory agencies to make No Further Action or other cleanup or corrective action determinations are intended to achieve the same overarching goal of protecting human health and the environment as the standards DTSC uses to determine corrective action completion, the standards themselves are not identical. Standards expressed in different statutes or regulations are formulated to apply to different situations or circumstances and may therefore differ in their implementation. Nevertheless, as discussed in the Navy's response to Comment #2 in DTSC's February 20,</p>	<p>Please note: informal comments on Section 3 received via e-mail on May 25, 2004 are being responded to with these responses to comments that were formally submitted to the Navy on June 17, 2004.</p> <p>DTSC's Specific Comments 11, 14, 15, 68 (3b) on the Draft Final FOST (November 2003): Comment noted. Responses to Specific Comments 11, 14, 15, 68 (3b) of the Draft Final FOST will remain as previously written as these responses reflect the Navy's position that the referenced statutory and regulatory requirements for adequate protection of human health and the environment are narrative standards rather than goals. These responses are also in accordance with language provided by DTSC in the "Reasons Why Project Is Exempt" section of the Notice of Exemption (NOE) for DTSC's proposed RCRA Corrective Action Completion Determination, which specifically stated: "The project is an administrative decision by DTSC that previously completed investigations and cleanup activities conducted under the regulatory oversight of DTSC, the US EPA, the Regional Water Quality Control Board, Santa Ana Region, and the Orange County Health Care Agency, on the property identified in the Finding of Suitability to</p>
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Reviewer: John Scandura, Chief, Office of Military Facilities, Southern California Operations Branch DTSC. Dated: June 17, 2004

Comment No.	Section/ Page No.	Comment	Response
		<p>2004 cover letter, for UST and AST sites within the area covered by the FOST that have received No Further Action determinations by other regulatory agencies, DTSC preliminarily concurs that RCRA Subtitle C corrective action has been completed. DTSC is proposing determinations of completion of RCRA corrective action and RCRA facility boundary redefinition for public review and comment concurrently with the Navy publishing their</p> <p>Draft Final Revision 2 FOST. DTSC requests the following changes be made to Section 3 of the FOST:</p> <p>Section 3.2, First Paragraph – “A NFA decision under one authority equates to an NFA determination under the others because of the similarity of their cleanup standards.” Please delete the sentence.</p> <p>Section 3.2, Fourth Paragraph – “Both federal statutes and associated state laws are directed at achieving the identical cleanup standard: adequate protection of human health and the environment.” Please change the sentence to read, “Both federal statutes and associated State laws are directed at achieving the same overarching goal: adequate protection of human health and the environment.”</p> <p>Section 3.2, Sixth Paragraph – “This FOST includes those SWMUs for which corrective actions have been completed and NFAs were received.” Please change the sentence to read, “This FOST includes those SWMUs for which cleanup actions have been completed and NFAs were received.”</p> <p>Section 3.3, Fourth Paragraph – “State statutes addressing UST corrective action were recently amended and retained the same cleanup standard.” Please change the sentence to read, “State statutes addressing UST corrective action were recently amended and retained the</p>	<p>Transfer (FOST) as Parcel IV and Portions of Parcels I, II, and III, <b>have satisfied the corrective action requirements under RCRA and the Hazardous Waste Control Law.</b>” (emphasis supplied).</p> <p>Section 3.2, First Paragraph – This sentence will be deleted, as requested. .</p> <p>Section 3.2, Fourth Paragraph: This sentence will be deleted.</p> <p>Section 3.2, Sixth Paragraph: Text has been edited as noted.</p> <p>Section 3.3, Fourth Paragraph: Text has been deleted.</p>

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*Reviewer: John Scandura, Chief, Office of Military Facilities, Southern California Operations Branch DTSC. Dated: June 17, 2004*

Comment No.	Section/ Page No.	Comment	Response
		<p>same cleanup goal."</p> <p>Section 3.3, Fifth Paragraph – "The cleanup standard set forth in DTSC's corrective action cleanup standard at Title 22 CCR 66264.101(a) is substantively equivalent and nearly identical to the corrective action cleanup standard for USTs implemented by the RWQCB and OCHCA. In addressing the cleanup standard codified in HSC 25296.10(b), Title 23 CCR 2720 (definition of "corrective action") and 2725(c), the RWQCB and OCHCA also ensured that the cleanup standard at Title 22 CCR 66264.101(a) was complied with." Please delete these two sentences.</p> <p>Section 3.3, Sixth Paragraph – "This FOST includes those UST sites in which corrective actions have been completed and NFAs were received." Please change the sentence to read, "This FOST includes those UST sites for which Subtitle I corrective actions have been completed and NFAs were received."</p>	<p>Section 3.3, Fifth Paragraph: The entire fifth paragraph will be replaced with the following text:</p> <p>"The corrective action cleanup standard for USTs implemented by the RWQCB and OCHCA are codified in HSC 25296.10(b), Title 23 CCR 2720 (definition of "corrective action") and Title 23 CCR 2725(c) (soil and water investigation phase, corrective action plan). As noted in Section 3.2, DTSC has determined that investigations and cleanups conducted under the oversight of the Regional Water Quality Control Board and Orange County Health Care Agency on property identified in this FOST as Parcel IV and Portions of Parcels I, II, and III have satisfied the corrective action requirements under RCRA and the Hazardous Waste Control Law."</p> <p>Section 3.3, Sixth Paragraph: Text has been edited as requested.</p> <p>As a result of the aforementioned changes, the following text in "Section 3.3, Fourth Paragraph, Second Sentence will be <i>modified</i> to read, "HSC §25296.10(a) was recently amended and now provides that the State Water Resource Control Board...."</p> <p>The following text will be <i>added</i>:</p> <p>Section 3.2, Fourth Paragraph, After the First Sentence:</p> <p>The cleanup standard for CERCLA is set forth in Section 121 of CERCLA (CLEANUP STANDARDS), which states in relevant part of Subsection 121(b)(1): "...The President shall select a remedial action that is protective of human health and the environment..." (42 U.S.C. Section 9621(b)(1))</p> <p>The following text will be <i>added</i>:</p> <p>Section 3.2, After Sixth Paragraph:</p> <p>DTSC has proposed a RCRA corrective action completion</p>

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Comment No.	Section/ Page No.	Comment	Response
			<p>determination for this FOST property (see section 3.4). Additionally, DTSC has proposed a California Environmental Quality Act (CEQA) Notice of Exemption (NOE) for DTSC's proposed RCRA Corrective Action Completion Determination. The NOE included the following language in the "Reasons Why Project Is Exempt" section: "The project is an administrative decision by DTSC that previously completed investigations and cleanup activities conducted under the regulatory oversight of DTSC, the US EPA, the Regional Water Quality Control Board, Santa Ana Region, and the Orange County Health Care Agency, on the property identified in the Finding of Suitability to Transfer (FOST) as Parcel IV and Portions of Parcels I, II, and III, have satisfied the corrective action requirements under RCRA and the Hazardous Waste Control Law."</p> <p>Finally, the Navy has never indicated in the FOST or our responses to DTSC comments that DTSC lacks the authority to make findings regarding compliance with title 22, California Code of Regulations, section 66264.101(a) and further the Navy agrees that DTSC has this authority.</p>
2.	Section 4.1.2.3, Site 19 – Aircraft Expeditionary Refueling Site, Page 4-4, Second to the Last Paragraph, Second Sentence	The sentence states that, "Ten randomly selected soil samples from the stockpile of approximately 229 cubic yards were reported with PCB concentrations greater than industrial PRGs." This sentence is inconsistent with what is stated in Attachment 2b. Attachment 2b states that, "Unit 2 of IRP Site 19 was backfilled with soil contaminated with concentrations of PCBs greater than residential PRGs, with a maximum reported concentration of 20 mg/kg." Although both sentences are correct, please make them consistent and state that the PCB concentrations are greater than "residential PRGs".	Section 4.1.2.3 will be revised to state PRGs exceed residential PRGs rather than industrial PRGs.
3.	Section 4.2.1 Transfer Parcel I-A, Page 4-7, Paragraph 1	For consistency with Page 2-2 and Sections 4.2.2 and 4.2.3, please state that the buildings/structures/facilities listed are "non-demolished".	Text will be edited as noted.
4.	Section 5.1, School Site Considerations	In line 4, change "Section" to "section" and "et. Seq." to "et seq."	Edits have been made as requested.

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Comment No.	Section/ Page No.	Comment	Response
	, Page 5-1		
5.	Section 5-11, Asbestos-Containing Material, Page 5-9, Restrictions, (b) Buildings/Structures/Facilities Requiring an ACM Survey, Bullet 2	If a survey was never performed for Building 5103, please italicize the building number (see 1 <sup>st</sup> paragraph under restrictions on page 5-8).	Building 5103 has been italicized.
6.	Section 5-11, Asbestos-Containing Material, Page 5-9, Restrictions, (b) Buildings/Structures/Facilities Requiring an ACM Survey, Bullet 3	If a survey was never performed for Buildings 831, 835, 840, 841, 847, 848, 854, 855, 856, 868, 869, 870, 871, 872, please italicize the building numbers (see 1 <sup>st</sup> paragraph under restrictions on page 5-8).	Buildings listed have been italicized.
7.	Section 5.12, Lead-Based Paint, Notifications, Nonresidential Buildings/Structures/Facilities, Pages 5-12 and 5-13	In the Draft Final FOST, dated November 2003, there was a lead-based paint notification for nonresidential structures included. The notification was as follows: "When the transferee demolishes target housing [sic] following transfer and plans to redevelop such property as residential real property, the transferee shall, after demolition of the existing target housing [sic] units, evaluate the soil adjacent to the demolished housing for soil lead hazards. The transferee shall conduct any necessary abatement of any soil-lead hazards prior to occupancy of any newly constructed residential facilities." On April 27, 2004 DTSC sent an electronic mail to the Navy requesting the Navy to move the above notification to the restriction section. In the FOST that is currently out	<p>The 1999 joint EPA/DoD Field Guide for lead-based paint states that, when target housing is demolished post-transfer and redeveloped as residential real property, transferees will be required to conduct post-demolition soil sampling for soil-lead hazards and abate any such hazards prior to occupancy of any newly-constructed dwellings. This requirement does not apply to non-residential structures. Therefore, including such a restriction for non-residential structures to the FOST would be inconsistent with DoD policy. Moreover, the Navy's understanding, per DTSC, is that California has no state-promulgated requirements for post-demolition soil sampling.</p> <p>However, the Navy feels it would be appropriate to include a notification in the FOST for nonresidential structures (rather than</p>



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Comment No.	Section/ Page No.	Comment	Response
		for public review and comment (draft final revision 2), rather than moving the notification to the restriction section, the Navy deleted it all together. However, in a response from the Navy (electronic mail dated May 4, 2004), the Navy agreed to place a notification in the Final FOST and proposed some language. DTSC was not satisfied with the language and proposed some changes (electronic mail dated May 5, 2004). DTSC proposes that the following notification be included in the Final FOST: "Demolition of non-residential buildings/structures/facilities built prior to 1978 creates the possibility of lead being found in the soil as a result of such activities. With respect to any such non-residential buildings/structures/facilities which the transferee intends to demolish and redevelop for residential use after transfer, the transferee will be required to demolish the buildings/structures/facilities in accordance with local, state, and federal requirements and conduct post-demolition soil sampling and abatement of any soil-lead hazards." If this language is not included as a notification in the Final FOST, it will become an unresolved comment.	<p>target housing, which will be subject to a deed restriction for post-demolition sampling), to the effect that there may be requirements pertaining to post-demolition soil sampling with which transferees would need to comply.</p> <p>The following text will be added to the Notifications, Nonresidential Buildings/Structures/Facilities section:</p> <p>"Demolition of non-residential buildings/structures/facilities built prior to 1978 creates the possibility of lead being found in the soil as a result of such activities. With respect to any such non-residential buildings/structures/facilities which the transferee intends to demolish and redevelop for residential use after transfer, the transferee may, under applicable law or regulation, be required by DTSC or other regulatory agencies to evaluate the soil adjacent to such non-residential buildings/structures/facilities for soil-lead hazards, and to abate any such hazards that may be present, after demolition of such non-residential buildings/structures/facilities and prior to occupancy of any newly constructed residential structures."</p>
8.	Table 4: Temporary Accumulation Area Sites, TAA 744	The "Notes" state that soil samples were collected and that based on the results, NFA was recommended, however, the "ECP Category" is listed as a type 1. Was there, or was there not a release or disposal of hazardous substances or petroleum products at this site? Please make any necessary corrections.	Because sampling results did indicate a release (although not a release requiring further action), the ECP Category has been revised to be Category 3.
9.	Table 4: Temporary Accumulation Area Sites, TAA 461	The "Notes" are not consistent with the "ECP Category". Please correct.	Because sampling results did indicate a release (although not a release requiring further action), the ECP Category has been revised to be Category 3.
10.	Table 5: Aerial Photograph Anomaly Sites, APHOs 94 and 115	The "Notes" are not consistent with the "ECP Category". Please correct.	Because NFA concurrence was based on visual inspections, the ECP Category for APHO 94 and APHO 115 has been revised to be Category 1.

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Comment No.	Section/ Page No.	Comment	Response
11.	Table 6: Installation Restoration Program Sites	IRP 20 – The “Date of Operation” is not consistent with page 4-5. Please correct.	The dates of operation are accurate, as is information on page 4–5. On page 4-5, the last sentence in the first paragraph has been clarified to read: “From 1976 until closure of the Hobby Shop in 1999, a biodegradable soap was used in place of kerosene.”
12.	Table 7: AST/UST Sites	AST 670 – Per DTSC/Navy discussions on 6-15-04, please change the information in the “NFA Letter Agency/Date” column to read, “Per BCT approval of 1995 EBS”. Please include the approval letters for the 1995 EBS in Attachment 1. It would also be helpful to include the approval dates in the “NFA Letter Agency/Date” column for AST 670.	Edits have been made as requested.
13.	Table 9: Wash Racks	RFA 157 – The “Notes” are not consistent with the “ECP Category”. Please correct.	Because further action was required at the site, the ECP Category for RFA 157 has been revised to be Category 2b. This ECP Category is consistent with the information presented in Table 3 for RFA 157.
14.	Table 14: Summary of Asbestos Survey	Building 722 is listed as a building requiring an ACM survey on page 5-9, but it is missing from this table. Please include.	Building 722 has been added to Table 14.
15.	Table 16b: Notifications and Restrictions Summary for Buildings/Structures/Facilities within Transfer Parcels	<p>Lead-Based Paint Column – The reference to Section 5.12(a)N,R is not entirely correct. The notifications are in Section 5.12 and the restrictions are in Sections 5.12(a) and (b). Please correct.</p> <p>Asbestos – The reference to Section 5.11(a)N,R; 5.11(b)N,R; and 5.11(c)N,R is not entirely correct. The notifications are in Section 5.11 and the restrictions are in Sections 5.11(a), (b) and (c). Please correct.</p> <p>Page 12 of 27, Parcel I-A, East of Building 364<sup>6</sup> – Per DTSC/Navy discussions on 6-15-04, please change the building/structure/facility from “East of Building 364<sup>6</sup>” to “MSC W1, MSC W2<sup>6</sup>”.</p> <p>Page 12 of 27, Parcel II-A, Building 121, 5.2R<sup>4</sup> – Per DTSC/Navy discussions on 6-15-04, please change the restriction for Building 121 to a notification.</p>	Edits have been made as requested.

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Comment No.	Section/ Page No.	Comment	Response
16.	Figure 5c: AST and UST LOCs	Table 7 shows AST 146 and UST 275 as being closed in place. However, on Figure 5c, AST 146 is shown with an "(I)" for Inactive and UST 275 is shown with an "(A)" for Abandoned. If both tanks have been closed in place, then Figure 5c should be consistent showing them both as inactive or both as abandoned. Please correct.	The presentation of AST 146 on Figure 5c has been revised to be "146(A)" to indicate its status as closed in place. Note 4 in the legend has been revised to delete reference to Inactive (I).
17.	Figure 6b: Wastewater Treatment and Related System LOCs	Table 3 shows RFA 306 as being inactive, but Figure 6b does not have an "(I)" by the site number indicating that it's inactive. Please correct. Table 3 doesn't state whether RFA 305 has been removed or not. Please include this information in Table 3 and make any necessary corrections to Figure 6b. Table 8 shows OWS 766A as being closed in place, but Figure 6b does not have an "(I)" by the site number indicating that it's inactive. Please correct.	<p>The presentation of RFA 305 and RFA 306 on Figure 6b has been revised to be "RFA 305(I)" and "RFA 306(I)" to indicate their status as inactive.</p> <p>The statement "Site is inactive" is included in the notes column for RFA 305 in Table 3.</p> <p>OWS 766A has been corrected to show the site as OWS 766A(I) to be consistent with other OWS sites that have been closed in place. The notes section of Figure 6b has also been corrected to remove "Abandoned (A)".</p>
18.	Attachment 4: Comments/Responses to Comments	<p>Please ensure that the Errata Sheet for the Draft Final Revision 2 Finding of Suitability to Transfer is appropriately addressed in the Final FOST.</p> <p>Draft Final FOST (DTSC Comment Letter February 20, 2004), Specific Comment #19 – The Navy responded, "...no edit will be made to page 4-1." However, after reviewing page 4-1, DTSC notes that the following change <b>was</b> made: "Buffer zones concurred upon by FFA signatories for IRP Sites with RODs not finalized." Please correct.</p> <p>Draft Final FOST (DTSC Comment Letter February 20, 2004), Specific Comment #68(1c)– The Navy responded, "Since there are no restrictions required for LOCs, this bulleted statement is accurate."... However, after reviewing Tables 3-8, Bullet 3, DTSC notes that a change <b>was</b> made and the bullet now reads, "No engineering controls, institutional controls, or restrictions are required for any of the LOCs. Relevant notifications and restrictions for buildings/structures/facilities associated with LOCs are summarized in Table 16a/b." Please</p>	<p>Items from the Errata Sheet will be incorporated into the Final FOST.</p> <p>Specific Comment #19 – Due to additional internal comments and editing, text on page 4-1 was modified, and the corresponding response was inadvertently not modified accordingly. However, as these former responses are part of the Administrative Record, the responses to the Draft Final FOST in Attachment 4 will remain the same.</p> <p>Specific Comment #68(1c)– The current, modified bullet 3 provides additional clarification, but the former bullet was also accurate. The former response is therefore not incorrect as written. As these former responses are part of the Administrative Record, the responses to the Draft Final FOST in Attachment 4 will remain the same.</p>

**Document Titles:**

(1) Draft Final Revision 2, Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, May 2004

*Reviewer: John Scandura, Chief, Office of Military Facilities, Southern California Operations Branch DTSC. Dated: June 17, 2004*

Comment No.	Section/ Page No.	Comment	Response
		correct.  Draft Final FOST (DTSC Comment Letter February 20, 2004), Specific Comment #121 – It states that the comment was sent via e-mail 3/30/04, however, the correct dates are 4/13/04 and 4/27/04. Please correct.	Specific Comment #121: Comment noted. As these former responses are part of the Administrative Record, the responses to the Draft Final FOST in Attachment 4 will remain the same.
19.	Attachment 5: Unresolved Comments	Per discussions with the Navy, Unresolved Comments will be addressed in the Final FOST.	Comment noted. Responses to these comments will be forwarded to the FFA signatories for review on June 28, 2004. The Navy requests that DTSC provide concurrence on these responses and identify unresolved comments, if any, no later than July 7, 2004.

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

**Reviewers: Public**

Comment No. and Commentor's Name	Date	Comment	Response
1. Bill Turner	5/6/2004 5/7/2004	<p>I have written you a fairly detailed letter on why the land at El Toro should not be transferred at this time and attached it to this e-mail. In addition, I have also attached a letter that I sent to Dean Gould on February 25, 2004.</p> <p>It is my opinion, at this time that, the closing of El Toro is fraught with massive fraud and political corruption. It appears to me that the U.S. Government and the American taxpayers have been bilked out of billions and billions of dollars to benefit a few developers and politicians. At the very least, a detailed, public investigation should be made to determine if BRAC policy was followed in closing El Toro. We know that the government did not save any money at all on closing El Toro but rather had to spend Billions to make the necessary moves to close El Toro.</p>	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>

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Comment No. and Commentor's Name	Date	Comment	Response
2. J.K. Leason	5/9/2004	<p>The transfer of El Toro for development purposes has not been proper since the BRAC criteria was not appropriately applied to El Toro. I ask you, what was the criteria applied to El Toro in 1993 to close the airbase in the first place? Since this was never done, this whole process was started incorrectly in the first place.</p> <p>El Toro IS a viable air base and should remain such! The huge developments planned in its place will bring Orange County to a constant state of gridlock.</p> <p>Reject the FOST!</p>	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment</p>

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3. Thomas M. Whaling	5/10/2004	<p>I was privy to a water quality study presentation of the Sand Canyon Plume by a University of Chicago professor whom the Department of the Navy had engaged during the time of the Tustin MCAS evaluation. Where is that study housed? This was done while I was a member of the Tustin RAB. Has there been a more recent study in the last 4 years? Has the Irvine Water District conducted such a study? The reason I send this query is that I have seen streams and lakes proposed for the Great Park. Please advise.</p> <p>Thanks</p>	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>

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			<p>Furthermore, without specific detail pertaining to the water quality study presentation, the Navy is unable to direct you to the exact report. Installation Restoration Program (IRP) Site 18, the regional volatile organic compound (VOC) groundwater plume in the principal aquifer, is located off-Station and extends off-Station from the westernmost boundary of MCAS El Toro approximately 3 miles to the west beneath the city of Irvine. Current environmental information is available on IRP Site 18.</p> <p>Relevant and supporting environmental documentation for this FOST and IRP Site 18 documentation is available at Marine Corps Air Station (MCAS) El Toro and at the MCAS El Toro Information Repository. Please note that IRP Site 18 is not associated with this FOST. To review documents at MCAS El Toro please contact Ms. Marge Flesch at (949) 726-5398. The Information Repository is located at: Heritage Park Regional Library, 14361 Yale Avenue, Irvine, California, (949) 551-7151 (call for current hours).</p>
4. Glen Worthington, City of Irvine	5/10/2004	Congratulations to you and your team on getting the draft final FOST published. Especially noteworthy is the fact that the Navy and DTSC have also reached an agreement on the RCRA issues.	Thank you for your comment. The Draft Final Revision 2 Finding of Suitability to Transfer (FOST) was formally public noticed and available for public comment from May



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		<p>issues.</p> <p>What are the next steps following the public review period? Do you publish a Final FOST? Will there be a published response to the comments received? Will you publish a Record of Decision?</p> <p>On the sale side, the Navy is anticipating that the FOST will be signed by 7/30/04 and that the IFB will be published by 8/29/04.</p>	<p>3, 2004 through June 17, 2004.</p> <p>All comments pertaining to the FOST will be responded to and included in Attachment 4, Comments/Responses to Comments, of the document. Any necessary changes to the FOST will be incorporated prior to finalization. The Navy is anticipating that the FOST will be signed by August 2, 2004.</p> <p>A Record of Decision for the FOST conclusions is not necessary. However, the Navy will issue a notice in the newspaper after the Final FOST is signed.</p> <p>For public information pertaining to the sale please visit the following website:  <a href="http://www.heritagefields.com">http://www.heritagefields.com</a></p>
5. James M. Lawson, University of California at Irvine	5/14/2004	Is it possible to receive a copy of the Draft Final FOST regarding certain property at the former MCAS El Toro?	<p>Thank you for your interest. The Draft Final Revision 2 Finding Of Suitability to Transfer (FOST) is available for public review and comment at Marine Corps Air Station (MCAS) El Toro and at the MCAS El Toro Information Repository. To review a copy of the document at MCAS El Toro or to check it out for copying, please contact Ms. Marge Flesch at (949) 726-5398. The Information Repository is located at: Heritage Park Regional Library, 14361 Yale Avenue, Irvine, California, (949) 551-7151 (call for current hours).</p> <p>NOTE: This comment was responded to via email on May 28, 04.</p>
6. Ann Watt, The New Millennium Group	6/15/2004	MCAS El Toro is a federally owned property. Federally owned means those paying federal income taxes own this military base. The best reuse for a federal property is one that benefits	Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do

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Group		<p>the nation as a whole.</p> <p>As it now stands, the Department of the Navy is scheduled to auction off MCAS El Toro. The beneficiaries of this auction will be a small group of developers. It is not judicious nor morally right to allow the sale of a federal property for the benefit of the few.</p> <p>There are over 933 housing units at MCAS El Toro that sit empty while there are over 1,000 troops waiting for base housing at Camp Pendleton - a mere 15 minute train ride from El Toro. A private party has made a proposal to BUY these housing units FROM the Department of Defense and RENOVA TE THEM AND LEASE THEM TO OUR MILITARY TROOPS AT NO COST TO THE TAXPAYER.</p> <p>The Department of the Navy and the Department of Defense continue to ignore the private party's proposal in spite of the fact that our troops need affordable housing, the units have already been bought and paid for by federal taxpayers, cost of renovation of the units would be borne by the private party, and the best reuse of federal property is a federal purpose - i.e., national defense.</p> <p>The Inspector General of the United States of America must do a thorough investigation of the closure of MCAS El Toro. This closure was politically motivated and has cost the taxpayers untold BILLIONS. The Department of Defense will never recoup the billions wasted.</p> <p>The Department of Defense must realize they are in a hole - and the first thing they must do when they find themselves in a hole is to stop digging!</p> <p>MCAS El Toro must remain as a federal property. The military housing units should be sold to the private party that has made their proposal to the Department of the Navy with the stipulation that the renovated units will be leased to our troops for low cost housing. The rest of MCAS El Toro - a former air base should</p>	<p>not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>

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		be reused as an air base by leasing the runways to Los Angeles World Airports as a joint military-commercial enterprise - thereby benefiting the nation with additional runways in our national transportation system and preserving the runways for our national defense system.	
7. P.D. Green	6/16/2004	Please excuse my bluntness, but everyone besides the south Orange County NIMBYs knows that El Toro should be converted into an AIRPORT! Other than that this has been what I call the GREAT IRVINE LAND GRAB.	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such</p>

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			<p>requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
8. Ron Felicioni	6/16/2004	<p>As a 50 yr LA resident it saddens me to see the city's infrastructure become so overburdened that future growth is easily viewed as a negative. Traffic congestion, the most extreme in the US, is one example of the inability of the governing entities to meet the needs of it's citizens.</p> <p>El Toro is an opportunity to make a significant impact on traffic and other environmental problems by having it become a part of a regional airport solution to air traffic growth which is unceasing in the So Cal area.</p> <p>Yet those who do not wish to share the burden in their community argue otherwise, argument that no matter how cleverly cloaked, is transparent in seeking to preserve the status quo. They wish to avoid the problems associated with an airport in their community seeking instead to transfer their needs to another county.</p> <p>Clearly, the greatest good for the greatest number is to continue using El Toro as an airport just as it has served these many years. It is in-arguable, objectively, to think of closing this important facility at a time when the need for added commercial aircraft facilities has increased so rapidly.</p> <p>I urge the Navy to initiate a course of action on the disposition of El Toro that will cause a re-examination of the implications of the loss of this facility on the entire region.</p>	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such</p>

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			<p>requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
9. Tina E. Hirt	6/16/2004	<p>I know that this must be a busy time for you and probably my e-mail is not something that you want to even deal with - please just glance at my request.</p> <p>From a safety point of view it makes no sense to not use El Toro in the manner it was originally fitted for. (There are millions of dollars of electronics that already exists there.) What I mean is this - a worst case scenario: If we assume that LAX is the biggest airport in our area and the most able to support commercial trade and passengers, then we must accept that it is by definition the most vulnerable. That is to say, the fire which shut it down a few months ago, was felt around the world. Since it is in West Los Angeles, it is prone to the same earthquakes as the rest of us are. Don't forget they have to examine the tarmac after each incident to ensure passenger and cargo safety. And of course, there is the outside possibility that some kind of terrorist act could shut the place down for an indeterminate amount of time. If any of these things were to happen - how would we re-route the air traffic of this area? Burbank is way too small and cannot accommodate larger aircraft. Long Beach - is even smaller and has restrictions on night landings. John Wayne - small and has restrictions on night landings. Ontario - well, they bring their commercial stuff to LAX - so I am guessing they are not in a position to take the slack off of LAX. We must draw only one conclusion - we are not prepared for a worst case scenario.</p> <p>However, you have at your disposal the acreage, the computer software and with some updating the somewhat intact version of an airport. Plus, El Toro has had some expertise in this matter. And El Toro offers the ability to "spread around" the airports in our region. El Toro would make us less dependant</p>	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such</p>

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		<p>on LAX as well as offer us airports as far away as Burbank to Laguna. And then from Ontario to LAX. It makes sense to diversify. It makes sense not to put all your "eggs in one basket".</p> <p>Please consider my thoughts on this matter.</p>	<p>requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
10. Rex Ricks	6/16/2004	<p>I have to say the Federal Government's infinite wisdom never ceases to amaze me. On one hand, we have the Department of Transportation and the FAA saying Southern California needs additional air capacity by 2013. Then on the other hand, the Navy is planning to auction off the former El Toro Marine Corps Air Station so that developers can add more strip malls and cookie cutter housing to the City of Irvine. So which is it? Does Southern California really need more airport capacity? Or, does El Toro simply represent excess runway supply that justifies the Navy auctioning it off? Perhaps the GAO should figure this out for all of us and clear up the confusion before any further action is taken on El Toro.</p> <p>The logic for auctioning off El Toro is that Orange County voted for a park at the site. However, there were only 13 cities out of 34 Orange County cities that passed Measure W. Yet, the rest of the region does not get a vote on the matter. So, will the FAA allow a vote on airport expansion to those near airports at Burbank, LAX, John Wayne, Long Beach, March, and San Diego? I doubt it. Therefore, South Orange County gets to dictate transportation planning for the rest of the region. Talk about the tail wagging the dog.</p> <p>As for the proposed auction; considering the Navy's track record with the former Hunters Point Naval Shipyard in San Francisco, I will be amazed if they will be able to get El Toro cleaned up in a timely manner, let alone turn a profit after all cleanup costs are factored in. In fact, Senator Dianne Feinstein had to intervene to make sure the Navy finished the job that has taken over 20 years to date. I wonder if that will happen again at El Toro. As a taxpayer, I am amazed the Navy would go through</p>	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal</p>

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		<p>so much trouble just to benefit the city of Irvine so that they can increase their tax base with more development. So, what's in it for the rest of the region's taxpayers who paid around 10 billion to construct that base? It would be so much easier and profitable in the long run to lease the property to the L.A. Airport Authority. But that's too logical.</p> <p>Also, I see that this November, the Navy will finally get around to selling off a 200-acre parcel of farmland south of the runway. Now why November? That sure wouldn't have anything to do with waiting until an upcoming election is finished, now would it? Nah. That 200-acre parcel will commence the ground breaking part of the so called "Great Park" featuring the expansion of a local auto mall. Well, it will be quite fitting to have used car salesmen running all over the place considering that the voters were basically sold a lemon about a fantasy park. But in the event there actually is some parkland, then Irvine will have no problem nourishing the grounds. That's because their politicians sure produce plenty of fertilizer.</p> <p>Maybe the rest of this region can't weigh in on El Toro, but this November (before the auction starts) we can all vote as to whether or not the current administration that oversees the FAA and the Navy gets to stay in office. Don't forget, money from California can work it's way into some swing states as well. Choose Wisely.</p>	<p>requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
11. Shirley A. Conger	6/16/2004	<p>The Draft Final Finding of Suitability to Transfer (FOST) for certain property at the former Marine Corps Air Station (MCAS) El Toro is not environmentally suitable for transfer in accordance with Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act.</p> <p>The former Marine Corps Air Station El Toro is grossly contaminated in Parcels 1, 2, and 3. In a recent court case of the Airport Working Group vs. the Navy, the Navy agreed to reevaluate its environmental impact report and agreed to clean up the contamination. Until the Navy</p>	<p>Thank you for your comment. While the Navy appreciates your concerns, we respectfully contend that the property covered by our Draft Final Revision 2 Finding of Suitability to Transfer (FOST) is in fact suitable for such transfer from an environmental perspective, based on the information contained therein and in other relevant documents such as the Environmental Baseline Survey, and on the Navy's ongoing coordination with federal and</p>

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**Reviewers: Public**

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		<p>and agreed to clean up the contamination. Until the Navy completes this clean-up, the property cannot be used for housing and commercial development (Irvine's plan). There are several contaminated plumes in the ground which extend under the runways. These will be extremely difficult and expensive to rid of their toxic contamination.</p> <p>The city of Irvine professes to be following the "will of the people" because of the vote on Measure W in March, 2002. However, as soon as the property is transferred to Irvine, it is out of county jurisdiction and Measure W no longer is in effect. Irvine has no intention nor is it legally obligated to follow the dictates of voter-approved Measure W. Irvine's real purpose is to build a complex of housing, commercial development, and miscellaneous uses with very few acres devoted to park land. However, in order to pacify the public, Irvine calls the whole development, the "Great Park."</p> <p>BRAC procedures call for approval of any transfer by the residents in the area. In November, 2002, Orange County voters overwhelming voted for a resolution which prohibited transfer of the MCAS El Toro until it was free of any contamination. This is clearly the "will of the people". To approve this transfer now is in violation of BRAC rules.</p> <p>In conclusion, I believe that it is not in the best interests of the Navy to go along with this plan. It will cost the Navy dearly to clean up this very contaminated military base. The Navy has had problems with clean-up at other bases, namely, Hunters' Point and Los Alamitos. The sale of the base land may never pay the Navy for the real cost of clean-up. A much better plan for the Navy would be to allow Los Angeles World Airways to operate a commercial airport and pay the Navy for the use.</p> <p>I urge the Navy to delay any transfer of the MCAS El Toro until the aforementioned conditions are met.</p>	<p>state environmental regulators throughout the FOST process.</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation. Furthermore, a Finding of Suitability to Lease (FOSL) has been prepared to support the lease of areas not suitable to transfer at this time.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use. The FOST is really a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of both the United States Environmental Protection Agency (USEPA) and California EPA regulatory agencies over the past many years. The Federal and State agencies are responsible for ensuring our program meets their regulations under the law.</p> <p>While the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
12. Kathy Striegl	6/17/2004	I STRONGLY believe that Orange County needs to TAKE RESPONSIBILITY for their air travel problems and needs. Why	Thank you for your comment. However, the Navy respectfully responds that the



**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

**Reviewers: Public**

Comment No. and Commentor's Name	Date	Comment	Response
		<p>should surrounding areas take it? El Toro NEEDS (it is the most logical thing) to be an airport to serve the growing Orange County population.</p> <p>In a family dynamic Orange County would represent the spoiled child who gets what he wants and never has to take responsibility. It's quite disgusting to force the residents of surrounding areas and ruin their lives in order to take on the air travel problem when a logical and feasible solution is at the hands of OC.</p> <p>The main thing to KEEP IN MIND is that lives and great family communities in surrounding areas are threatened by this airport issue--so OC NEEDS TO SHARE THE BURDEN!!</p>	<p>comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
13. Rosemary Caruso	6/17/2004	<p>It has come to my attention that the Navy is accepting comments on the former El Toro Marine corps air Station. I would urge the Navy to highly consider that El Toro needs to be</p>	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do</p>

## Document Title:

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

## Reviewers: Public

Comment No. and Commentor's Name	Date	Comment	Response
		<p>would urge the Navy to highly consider that El Toro needs to be utilized as an airport. Now I realize that only 13 out of 34 cities in Orange County got to vote on the proposed airport (Measure W) and the cities left out would have most likely joined those of us in LA county who oppose any more airport growth at the current airports that are already expanded- (rightly so-there is so much more population and it is too crowded to expand at these airports over here-dense population-schools, homes, etc.). The problem for instance is LAX voted to expand but they will remove several homes to do this. El Toro doesn't have homes nearby and with the need for more airports in the southern California area by 2013, why does a select few make decisions about a majority? An airport at El Toro wouldn't have caused problems for the nearby population as there isn't the risks of pollution to people like the dense populated areas of North Orange county, Long Beach, and LAX. The Navy would have to clean up El Toro and it would be very costly.</p> <p>This can be a win-win for all of us in Southern California. A select few from south Orange county shouldn't make decisions for a vast more of the population here considering the tax money generated from the many versus the few.</p> <p>I respect the Navy as my father served 23 years and three wars in the Navy. I know your input will consider all the options and you will make a good choice.</p> <p>Thank you for your time.</p>	<p>comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
14. Peggie Aono	6/17/2004	As someone who lives right in the flight path of the Long Beach airport, I would like to suggest that the El Toro base be used for	Thank you for your comment. However, the Navy respectfully responds that the

## Document Title:

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

## Reviewers: Public

Comment No. and Commentor's Name	Date	Comment	Response
		<p>commercial airport usage. It has been stated that the SoCal area will need more airport facilities. I would like to suggest that El Toro be used for that purpose, if it will mean less expansion at the already existing airports in the region.</p> <p>Thank you</p>	<p>comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
15. Charles Griffin	6/17/2004	<p>The Draft Final Finding of Suitability to Transfer (FOST) for certain property at the former Marine Corps Air Station (MCAS) El Toro and the proposed Resource Conservation Recovery Act</p>	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do</p>

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

**Reviewers: Public**

Comment No. and Commentor's Name	Date	Comment	Response
		<p>El Toro and the proposed Resource Conservation Recovery Act (RCRA) Corrective Action Complete Determination and hazardous waste facility boundary modification are intuitively, obviously, absolutely, and categorically inappropriate and incomplete because they have been prepared and published for the purpose of transferring contaminated property for use as private residences and public municipal park and recreation uses. The obvious appropriate use of this property is as an international airport operated by Los Angeles World Airports (LAWA) as illustrated on the website <a href="http://www.ocxeltoro.com">http://www.ocxeltoro.com</a>.</p> <p>The Draft Final Finding of Suitability to Transfer (FOST) for certain property at the former Marine Corps Air Station (MCAS) El Toro and the proposed Resource Conservation Recovery Act (RCRA) Corrective Action Complete Determination and hazardous waste facility boundary modification would be appropriate for the Navy to sell the closed MCAS El Toro to LAWA who could purchase it with FAA Aid-to-airport grant funds in order to expand aviation operations to meet the ever expanding air-transportation market in Southern California.</p> <p>An international airport at El Toro operated as proposed per <a href="http://www.ocxeltoro.com">http://www.ocxeltoro.com</a> would remove ever growing pressure to use a portion of the Marine bases at Camp Pendleton and Miramar as a commercial airport, and would provide the FAA airport funds (instead of Navy funds) to mitigate the contamination at the MCAS El Toro and to filter underground water contaminated in the future by the existing migrating underground toxic plum at the airport (as normal airport operating expenses).</p> <p>An international airport at El Toro would provide a base for military aircraft to protect against the growing inherent international terrorist threat against an aircraft suicide attack on the nuclear power plant at nearby San Onofre, and provide a base for aerial water-tankers to protect the contiguous natural wildlife preserve that stretches from the Riverside County line to the Pacific Ocean and provides wide natural uninhabited air</p>	<p>comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

**Reviewers: Public**

Comment No. and Commentor's Name	Date	Comment	Response
		corridors for arrival to and departure from an airport at El Toro into the prevailing on-shore wind and seasonal Santa Ana winds.	
16. Fred Fourcher	6/17/2004	<p>The four reasons why El Toro should not be transferred</p> <ol style="list-style-type: none"> <li>1. The base should never have been closed. The based did not qualify for closure since there was no reduction in force. Congressman Chris Cox and his wife who was on the base closure committee were representing special interests and not their constituents when they drove the base to be closed. The closure and movement of forces has cost the taxpayers billions of dollars that will never be recouped by the savings of the closure.</li> <li>2. Measure W did not represent the "will of the people". The measure promised open space however in the fine print "open space" was re-defined as development. Irvine was allowed to get their message out and spent a considerable amount doing so. The County was wrongfully stopped from communicating the facts until the election was over.</li> <li>3. Measure W was a bait and switch since it is no longer in effect. It has been replaced by laws approved during the annexation of the base by the city of Irvine. These documents that now control the future plans for the base call for 10% park and 90% development (As stated on pages 7&amp;8 of the "Great Park" Development Agreement submitted to the Local Agency Formation Commission 11/12/2003). I met with Irvine Mayor Pro-Tem Beth Krom yesterday who could not provide specific information to demonstrate otherwise. If those who voted for the Great Park knew they will get traffic and congestion they would not have voted for Measure W.</li> <li>4. El Toro is needed as a military base and joint use facility. The Marines in Southern California desperately need housing which the base can provide. More importantly Orange County currently exports more air travelers to other counties than it flies out of its own highly congested airport. The region is in serious</li> </ol>	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p>

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

**Reviewers: Public**

Comment No. and Commentor's Name	Date	Comment	Response
		<p>need of air transportation capacity which El Toro can immediately fill as a joint use facility. This would generate far greater revenues for the Navy and alleviate the substantial clean up costs.</p> <p>Please do not perpetuate the fraud that has surrounded the closure of El Toro. Consider what is in the best interest of the taxpayers of Orange County and the entire nation. The transfer of El Toro to special interests will be one of the most significant negative financial impacts on this region for the next 100 years.</p>	<p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
17. D.A. "Curt" Curtiss	6/17/2004	<p>As a previous Airport Commissioner, LAWA, I strongly believe that El Toro should be come a Commercial Airport. A Regional Solution is critical to the Air Transportation problems of Southern California. If the 20% or so of LAX traffic that originates in Orange County were transferred to El Toro, it would provide room at LAX for the projected growth in Los Angeles County.</p> <p>A commercial Airport at El Toro would provide jobs and economic growth for the area.</p> <p>The Federal Money that developed El Toro should be used to benefit all of Southern Californian not the city of Irvine.</p>	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and</p>

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

**Reviewers: Public**

Comment No. and Commentor's Name	Date	Comment	Response
			<p>Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
18. Edgar A. Saenz (Rep. M. Waters)	6/17/2004	<p>I work on airport issues for U.S. Congresswoman Maxine Waters, but write this on my personal behalf.</p> <p>The development of El Toro as a civil airport is not only an economic issue, it is <b>a security issue</b>. Decentralization of operations is a key aviation security tool. The disproportionate concentration of air operations at LAX makes that facility vulnerable to man-made and natural disasters. The dispersal of the passenger and cargo traffic away from LAX to a regional system of airfields enhances the safety of air passengers and security of Southern California's economy. Dispersal also mitigates operational impacts in the event of a terrorist attack. El Toro is suited to play an important role in the regional approach to air traffic and, thus, to improving the safety and security of people infrastructure, and the economy.</p> <p>Thank you for your consideration.</p>	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and</p>

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

**Reviewers: Public**

Comment No. and Commentor's Name	Date	Comment	Response
			<p>Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
19. Donald Nyre	6/17/2004	<p>This FOST is preoccupied with contamination at the El Toro airport and concentrates on remediation methods while ignoring concerns of open space preservation, cultural artifacts, and economic needs.</p> <p>This Finding of Suitability for Transfer is unsuitable for implementation because it fails to support the planned El Toro International Airport, desperately needed in Southern California.</p> <p>It carves the airport up into 4 pieces for sale and lease, which requires acquiring all of the parts in order to put the airport back together again. It leases, rather than sells, up to one-quarter of the land on the base in order to give the Navy time to remediate contamination for non-aviation use. It is biased against an airport, for which there is a clear and present demand for 30 to 50 million annual passengers.</p> <p>People are suffering all along the coast where there are airports, and the Federal Aviation Administration has said these airports must expand. But no one, absolutely no one is in the noise zone of the planned El Toro International Airport which your FOST attempts to destroy.</p> <p>Los Angeles has said it will run the airport under a long term lease of all of it, with more money to you than can possibly accrue from a sale and cleanup. The airport does not require the extensive remediation proposed for Irvine's Great Park.</p> <p>The Federal Aviation Administration already owns 1000 acres of</p>	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and</p>



## Document Title:

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

## Reviewers: Public

Comment No. and Commentor's Name	Date	Comment	Response
		<p>El Toro.</p> <p>Los Angeles is not regulated by the city of Irvine's zoning power, so you can deal with Los Angeles instead of Irvine. It even has its own airport police. So you should talk to L.A. and stop talking to Irvine, which is the arch-enemy of the planned El Toro International Airport.</p> <p>This Finding of Suitability for Transfer is pandering to housing developers, which is only a part of the economy. The economy needs the airport, and the economy is bigger than housing. There is a real need for the airport, not more border to border urban sprawl.</p> <p>This FOST affects not just Orange County, it affects the whole region. The Navy should modify its FOST to favor the airport, rather than the Great Park. This is necessary to be consistent with your Record of Discussion, which did not rule out aviation use.</p> <p>The Navy was wise to build this airport where it is. The site is a natural site for an airport, and the Great Park items will have to be removed anyway to restore the natural site.</p> <p>The planned El Toro International Airport has many outstanding features. It is away from the foggy coast. It lies in calm sheltered valley with energy-efficient cross runways pointing to where airplanes have to go. It has long low straight in approaches. It has freeways on three sides and fuel pipelines to feed the airplanes. It has a railroad station on the premises. The pilots and airlines just love El Toro.</p> <p>The airport can run 24 hours a day 7 days a week, and no one, absolutely no one, is in the noise zone. It will help protect open space and agricultural space in the area, which is popular with environmentalists.</p> <p>The Navy should not rush to dispose of this land. As long as you own it you can use it for military housing, emergency airfield use, and special events. The El Toro airport is part of Orange</p>	<p>Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

**Reviewers: Public**

Comment No. and Commentor's Name	Date	Comment	Response
		<p>County's Federal Emergency Management Plan. Did you know that?</p> <p>Take a look at the mess you created by selling off the Tustin Air Base. Now there are houses there, and much of the land is still contaminated.</p> <p>There is the issue of greater good here. Unbridled free enterprise does not always work for the greater good. Orange County needs the planned El Toro International Airport for 30 million annual passengers, and you can help make this happen.</p> <p>There is a moral issue here, with this FOST, that transcends the legal issues. It is not moral to proceed with the FOST, whether it is legal or not. There is a difference between legal and moral.</p> <p>This FOST fails to honor the will of the citizens of Orange County which voted overwhelmingly for Measure B in November 2002. Advisory Measure B requests that the Navy not transfer El Toro property until it is completely cleaned up. Your combination of leasing and selling violates citizens' trust.</p> <p>It fails to honor the will of the people on Measure W, which was your plan in 2002. Irvine is not bound by Measure W, so it can do whatever it wants to with the land.</p> <p>It fails to recognize the transportation plan prepared by the Southern California Association of Governments which shows El Toro handling 30 million annual passengers. SCAG has temporarily removed El Toro from its plan, hoping to build rapid transit to outlying airports, something that will not happen in time for the demand if ever and when at all.</p> <p>On the surface, the Navy's Great Park FOST, Finding of Suitability for Transfer, (Public Notice, advertisement, 5-2-04,) looks like a reasonable piecemeal way to dispose of the Marine Corps Air Station El Toro. But it threatens to throw the whole Base Realignment and Closure (BRAC) process into turmoil.</p>	

## Document Title:

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

Reviewers: Public

Comment No. and Commentor's Name	Date	Comment	Response
		<p>BRAC law expects consent of local citizens.</p> <p>Orange County Advisory Measure B, passed in November, 2002, requests that environmental clean-up of El Toro be completed prior to transfer to other ownership. That doesn't mean in bits and pieces. Currently, only the Navy, with its FOST, is standing in the way of the planned El Toro International Airport.</p> <p>The El Toro airport is needed to prevent aviation gridlock. The Department of Transportation will accept it and lease it to Los Angeles to operate. No one is in the noise zone. The Navy is not alone. Housing developers do not own the Navy. The Navy should get back to the job of defending the country and get out of land speculation and sales.</p> <p>Aviation demand is exploding in Orange County. It's almost as if representatives were dancing on the tip of a volcano which can erupt at any moment, and the Department of the Navy is in a quandary.</p> <p>Trying to turn a contaminated airport into a pristine park is a problem the Navy has been taking seriously. Its sale of parcels has been delayed many times, with only one, the approach parcel, currently available. And we don't know how many bombs may have fallen off the airplanes on approach and lie buried there.</p> <p>The Army, which handles buried bombs, is still finding bombs in south Orange County left over from World War 2. The Navy may well decide to turn it all over to Los Angeles to run, because it trumps Irvine's zoning, we need the airport, and it solves the problem of pollution.</p> <p>This Finding of Suitability for Transfer is unsuitable for implementation at this time. The Navy certainly can do better than this.</p>	
20. Denny Schneider,	6/17/2004	We, too, want to express our on-going disappointment that El Toro has been removed from consideration as an airfield due to	Thank you for your comment. However, the Navy respectfully responds that the

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

**Reviewers: Public**

Comment No. and Commentor's Name	Date	Comment	Response
Alliance for a Regional Solution to Airport Congestion		<p>a desire by some to get a quick buck instead of fostering a long range solution to the air commerce issue.</p> <p>The primary purpose of the Navy has always been to be a stalwart protector of our nation; this sale goes against that purpose. The Navy should not foster this by moving forward with the sale. This removes an important piece of the Regional Solution. Without that regional approach the entire area is being jeopardized economically due to the concentration of activity in one place.</p> <p>Please be further sighted than some local NIMBYS. The loss El Toro as a potential air field, of one of the few areas big enough (and already set up for air commerce), will preclude the ability to address the next expansion of air commerce needs by 2050.</p>	<p>comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
21. Rick Teplitz	6/17/2004	Much has been written about the El Toro issue and the Great Park scam. Let it be known that I am definitely on the side of	Thank you for your comment. While the Navy appreciates your concerns, we

## Document Title:

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

## Reviewers: Public

Comment No. and Commentor's Name	Date	Comment	Response
		<p>those who believe that El Toro should be an airport.</p> <p>Why? One basic premise. El Toro has been an airport for some 50 years. It is profoundly contaminated as would be expected at a major military airport. Southern California is desperately short of commercial airport space and the proper distribution of same. What else is left to think about? Political power and the screwing of the rights of the less powerful. That's the story of El Toro.</p>	<p>respectfully contend that the property covered by our Draft Final Revision 2 Finding of Suitability to Transfer (FOST) is in fact suitable for transfer from an environmental perspective, based on the information contained therein and in other relevant documents such as the Environmental Baseline Survey, and on the Navy's ongoing coordination with federal and state environmental regulators throughout the FOST process. The FOST provides the conclusion that any necessary remedial and corrective action has been taken and that the requirements of Comprehensive Environmental Response, Compensation, and Liability (CERCLA) Section 120(h) have been met at the Transfer Parcels, and that those parcels are suitable for transfer by deed for residential purposes, subject to the notifications and restrictions set forth in Section 5 of the FOST.</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection</p>

## Document Title:

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

## Reviewers: Public

Comment No. and Commentor's Name	Date	Comment	Response
			<p>Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact, all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
22. Lsubillyt	6/17/2004	<p>Reasons to <b><u>NOT</u></b> allow the land at El Toro to be transferred:</p> <p>There were significant problems with BRAC Process related to El Toro:</p> <p>The criterion for base closings specified for the BRAC committee was not appropriately applied to El Toro.</p> <p>i. First of all, what was the criterion for closing military bases during the 1993 process year when it was determined that El Toro would be closed?</p> <p>ii. How can the public get a copy of this criterion?</p> <p>iii. What specifically was that Criteria for closing military bases in 1993 and how was it applied to El Toro?</p> <p>iv. What were the official reasons given for closing El Toro?</p> <p>There was no reduction of Marine Air Forces.</p> <p>El Toro perfectly met the needs for the Marines and Miramar does not.</p> <p>Some local politicians have stated that El Toro was closed for economic reasons.</p> <p>You take a base worth \$10 Billion in airport assets, spend \$2 Billion to move the Navy out of Miramar back to the East Coast, take the Marines out of El Toro, a base that perfectly meets</p>	<p>Thank you for your comment. However, the Navy respectfully responds that the comment/statements you have submitted do not pertain to the Navy's determination that certain property at the former MCAS El Toro is suitable for transfer from an environmental perspective, nor do they address the nature, accuracy, or presentation of the information presented in the Draft Final Revision 2 Finding of Suitability to Transfer (FOST).</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection</p>

## Document Title:

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

## Reviewers: Public

Comment No. and Commentor's Name	Date	Comment	Response
		<p>their needs, spend \$2 Billion more to move them to a base that does not meet their needs, sell El Toro for \$500 Million, spend at least \$200 Million to clean it up which gives you a total sale price of \$300 Million which costs the U.S. Taxpayers to lose a total of \$13.7 Billion in assets and moving costs and say that that is good economic policy.</p> <p>U.S. Taxpayers lose \$13.7 Billion by moving the Marines out of El Toro.</p> <p>Why not just close Miramar? The U.S. Taxpayers would have saved Billions of dollars plus the Marines would have still had a facility that would meet their needs. There were 2,800 living units at El Toro but there are only 400 at Miramar.</p> <p>The Irvine Company is planning on developing:</p> <p>the land in Shady Canyon,</p> <p>the land up around Irvine Lake,</p> <p>the land in the 14,000 acres of Buffer Zone, and multiple thousands of living units on El Toro itself.</p> <p><b>Where are the traffic studies that show how all of this development is going to affect central Orange County and traffic through that part of the County?</b> It would be irresponsible for the federal government to transfer this land without those studies being made and reviewed.</p> <p>Measure W is not longer in effect if El Toro is transferred to the City of Irvine.</p> <p>The people of Orange County were told with Measure W that they were going to get a "Great Park" that would be under County jurisdiction.</p> <p>Measure W did not specify for the land at El Toro to be transferred to the City of Irvine.</p> <p>What the City of Irvine is planning is a "Great Real Estate</p>	<p>Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

**Reviewers: Public**

Comment No. and Commentor's Name	Date	Comment	Response
		<p>Development that does not even resemble what the people of Orange County were publicly told they were getting.</p> <p>The people of Orange County are not getting what they were promised in Measure W with the current El Toro Reuse Plan as put forth by the City of Irvine.</p>	
23. Bill Turner	6/17/2004	<p>The voters of Orange County passed Measure B that expresses their will that El Toro not be transferred until the entire Base is Cleaned up.</p> <p>Do NOT Transfer El Toro Until the Whole Base is Cleaned Up per Measure B.</p>	<p>Thank you for your comment. While the Navy appreciates your concerns, we respectfully contend that the property covered by our Draft Final Revision 2 Finding of Suitability to Transfer (FOST) is in fact suitable for transfer from an environmental perspective, based on the information contained therein and in other relevant documents such as the Environmental Baseline Survey, and on the Navy's ongoing coordination with federal and state environmental regulators throughout the FOST process. The FOST provides the conclusion that any necessary remedial and corrective action has been taken and that the requirements of Comprehensive Environmental Response, Compensation, and Liability (CERCLA) Section 120(h) have been met at the Transfer Parcels, and that those parcels are suitable for transfer by deed for residential purposes, subject to the notifications and restrictions set forth in Section 5 of the FOST.</p> <p>Please refer to Section 1 of the FOST for the specific purpose of the FOST; the evolution of potential reuses after the base was listed for closure; and the availability of additional environmental documentation.</p> <p>Our environmental efforts focus on</p>



## Document Title:

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

Reviewers: Public

Comment No. and Commentor's Name	Date	Comment	Response
			<p>investigating and cleaning up (if necessary) the station so that property is available for nearly any type of use (in this case meaning available for residential use). The FOST is a summary conclusion of all the individual environmental projects the Navy has currently completed with the assistance of the United States Environmental Protection Agency (USEPA), California EPA, and Orange County Health Care Agency over the past several years. The various environmental agencies are responsible for ensuring our programs meet their legal requirements, and in fact all such requirements have been met.</p> <p>Therefore, while the Navy appreciates your concerns, no change to the FOST has been made as a result of your comment.</p>
24. Greg Hurley, Greenberg Traurig, LLP via May 6, 04 email to Tayseer Mahmoud, Office of Military Facilities, Department of Toxic Substances Control	5/06/2004	<p>It is my understanding that the Navy last week formally published the FOST. I expect that this happened after your 2 day BCT meeting on final comments on the FOST &amp; FOSL.</p> <p>Is it true that at the end of this comment period the FOST is considered final?</p> <p>Do the regulators accept the published FOST as being adequate? It is my understanding that there are still outstanding issues on what the FOST must contain. For example, DTSC's position on lead based paint sampling, and incorporating the data on Perchlorate into the FOST &amp; EBS. How will these be disclosed after the approval of the FOST?</p>	<p>The Draft Final Revision 2 Finding of Suitability to Transfer (FOST) was formally public noticed and available for public comment from May 3, 2004 through June 17, 2004.</p> <p>All comments pertaining to the FOST will be responded to and included in Attachment 4, Comments/Responses to Comments, of the document. Any necessary changes will be incorporated prior to finalization in August 2004.</p> <p>The Navy has responded to all comments submitted by the regulatory agencies and the public. Any issues that have not been resolved can be found in Attachment 5, Unresolved Comments. DTSC's position on</p>

**Document Title:**

(1) Draft Final Finding of Suitability to Transfer (FOST) Revision 2, Former Marine Corps Air Station, El Toro, CA, May 2004

**Reviewers: Public**

Comment No. and Commentor's Name	Date	Comment	Response
			lead based paint sampling and perchlorate is articulated in Attachment 4 of the Final FOST. DTSC concurred with the Final Environmental Baseline Survey (EBS) by letter dated September 25, 2003 (FOST Attachment 1). This letter concurs with the conclusions of the EBS, which include conclusions regarding property classification and suitability to transfer. Basewide and site-specific perchlorate investigations conducted to date do not indicate any current impact to properties proposed for transfer. Detailed discussion of perchlorate sampling and the conclusion that no further investigation is necessary for FOST property is included in the EBS. Finally, the FOST was prepared in accordance with U.S. Department of Defense guidance documents and includes all notifications and restrictions to support the finding that any necessary remedial and corrective action has been taken and that the requirements of CERCLA Section 120(h) have been met.

## **Response to Comments on the Final FOST**

## Document Title:

(1) Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, July 2004

Reviewers: John Scandura, Chief, Office of Military Facilities, Southern California Operations Branch, DTSC. Dated July 22, 2004

Comment No.	Section/ Page No.	Comment	Response
GENERAL COMMENTS			
1.		<p>The Department of Toxic Substances Control (DTSC) has reviewed electronic versions of the revised text, tables, figures and attachments for the <i>Finding of Suitability to Transfer (Parcel IV and Portions of Parcels I, II, and III), Former Marine Corps Air Station, El Toro, California</i>, dated July 2004. Based upon review of the revised text, tables, figures and attachments, DTSC comments sent in a letter dated June 17, 2004 have been adequately addressed.</p> <p>This document, referred to as the FOST, is intended to establish that the property identified above is suitable for transfer by deed. There are specified areas that are subject to ongoing environmental investigations or response actions that are not suitable for transfer by deed. These areas have been carved out of the parcels proposed for transfer and are included in the <i>Finding of Suitability to Lease for Carve-outs I, II, and III, Former Marine Corps Air Station, El Toro, California</i>, dated July 2004.</p> <p>DTSC concurs that the property associated with this FOST can be transferred with the specified conditions, notifications and restrictions in a manner that is protective of human health and the environment.</p> <p>Thank you for providing DTSC with the opportunity to review the FOST. If you have any questions regarding this letter, please contact Mr. Manny Alonzo at (714) 484-5425 or Ms. Jennifer Rich at (714) 484-5415.</p>	<p>The Navy appreciates your concurrence on the Finding of Suitability to Transfer (FOST), with no unresolved comments, as documented in your letter dated July 22, 2004. The dedication by your agency in helping to complete this document, and the expertise presented by your staff, have greatly assisted in meeting our mutual goals of being protective of human health and the environment.</p>

**Document Title:**

(1) Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, June 2004

Reviewers: Kathleen H. Johnson, Chief, Federal Facilities and Site Cleanup Branch, Superfund Division, U.S.EPA, Region IX; Dated: July 27, 2004

Comment No.	Section/ Page No.	Comment	Response
GENERAL COMMENTS			
1.		<p>The U.S. Environmental Protection Agency (EPA) has reviewed the revisions made to the text, tables, figures and attachments for the Finding of Suitability to Transfer (Percol IV and Portions of Parcels I, II, and III), Former Marine Corps Air Station, El Toro, dated July, 2004. The revisions were sent via e-mail in response to comments made by EPA and the Department of Toxic Substances Control (DTSC). Based on the revisions made, EPA has no further comments on the FOST.</p> <p>The former Marine Corps Air Station El Toro is an installation on the National Priorities List (NPL). The FOST identifies approximately 2798 acres of property as suitable for transfer by deed per provisions of Section 120(h) of the Comprehensive Response, Compensation, and Liability Act (CERCLA). Pursuant to CERCLA 120(h)(3)(A)(i), the deed will contain a notice of hazardous substances stored, released, or disposed within the applicable transfer parcels. The deed will also contain a covenant warranting that any corrective action found to be necessary after the date of transfer shall be conducted by the United States.</p> <p>EPA has reviewed the FOST and associated revisions, as well as the Final Environmental Baseline Survey for the Former Marine Corps Air Station El Toro dated September, 2003. Without independent investigation or verification of certain information contained in these documents, the undersigned concurs with the Navy's determination that Parcels IV and Portions of Parcels I, II, and III are suitable for transfer by deed. Review of these documents were completed pursuant to CERCLA 120(h)(3) and 120(h)(4) and the sole purpose of this letter is to satisfy the requirements of these provisions. The concurrence shall not be construed in any manner inconsistent with any obligation, right or authority existing under the MCAS El Toro Federal Facilities Agreement entered into by EPA, the State of California and the Navy. The undersigned expressly reserves all rights and</p>	<p>The Navy appreciates your concurrence with the Finding of Suitability to Transfer (FOST). The commitment and effort that was afforded by your agency is much appreciated in completing this important milestone within the Base Realignment and Closure (BRAC) process.</p>

**Document Title:**

(1) Final Finding of Suitability to Transfer (FOST), Former Marine Corps Air Station, El Toro, CA, June 2004

Reviewers: Kathleen H. Johnson, Chief, Federal Facilities and Site Cleanup Branch, Superfund Division, U.S.EPA, Region IX; Dated: July 27, 2004

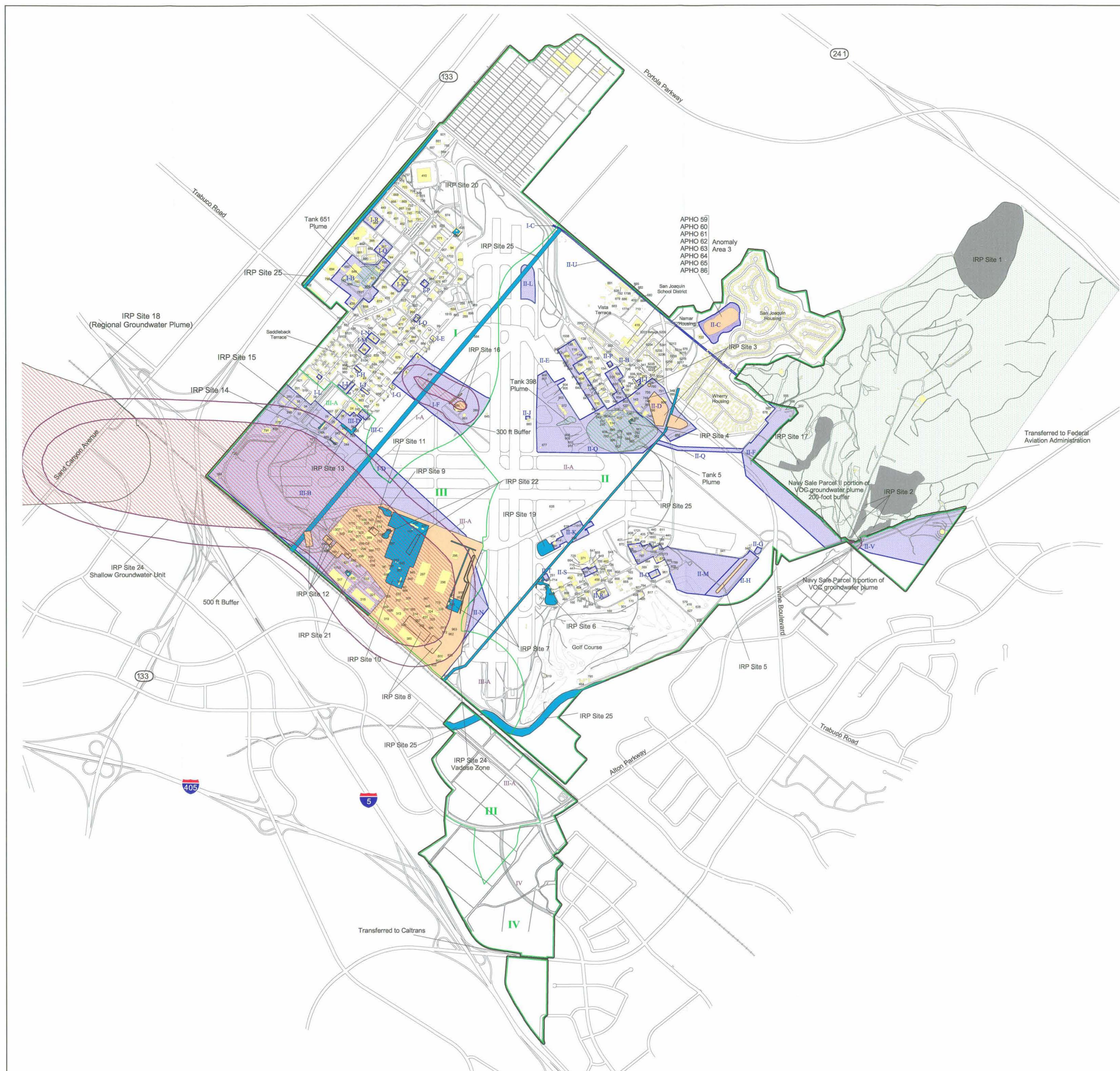
Comment No.	Section/ Page No.	Comment	Response
		<p>authorities relating to information not contained in the documentation provided, whether such information is known as of this date, or discovered in the future.</p> <p>EPA concurs that Parcel IV and Portions of Parcels I, II, and III at the Former Marine Corps Air Station, El Toro are suitable for transfer by deed subject to the notifications and restrictions set forth in Section 5 of the FOST. If you have any questions, please call Nicole Moutoux, the EPA Remedial Project Manager for MCAS El Toro at (415) 972-3012.</p>	

**Attachment 5**  
**Unresolved Comments**

There are no unresolved comments for this document.



**Attachment 6**  
**Installation Restoration Program Sites and Petroleum**  
**Groundwater Plumes (Plate Drawing)**



LEGEND

Property Boundary

Roads

Navy Sale Parcel Boundary

Navy Sale Parcel Number

Areas Suitable for Lease (Carve-Outs)

Carve-Out Number

Transfer Parcel Number (Parcel IV in entirety is suitable for Transfer)

Areas Suitable for Transfer

Transferred Property

Building/Facility

Building/Facility Number

IRP Sites (active)

IRP Sites (closed)

IRP Sites (outside FOST boundary)

IRP Site Plumes

Petroleum Groundwater Plumes

SOURCE

Final Environmental Baseline Survey,  
Former Marine Corps Air Station  
El Toro, California. Earth Tech 2003.

NOTES

1. IRP Site 24 comprises: (1) Vadose Zone, and (2) Shallow Groundwater Unit.

2. IRP Site 1 is Navy property and was addressed in a Site-specific EBS. IRP Sites 2 and 17 are located on FAA property. Carve-out II-X includes respectively the Navy Sale Parcel II portions of Site 2's (a) 1000-foot landfill buffer zone and (b) the Volatile Organic Compound (VOC) groundwater plume. Carve-out II-F includes the Navy Sale Parcel II portion of Site 17's 1000-foot buffer zone.

Final

July 2004

850 0 850 1700 2550 Feet

ATTACHMENT 6

Installation Restoration

Program Sites and

Petroleum Groundwater Plumes

Finding of Suitability to Transfer

Former MCAS El Toro

California

**Attachment 7**  
**RCRA Corrective Action Complete**  
**Determination Information**





## Department of Toxic Substances Control



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Edwin F. Lowry, Director  
5796 Corporate Avenue  
Cypress, California 90630

Gray Davis  
Governor

February 27, 2002

Mr. Dean Gould  
BRAC Environmental Coordinator  
Marine Corps Air Station El Toro  
Base Realignment and Closure  
P.O. Box 51718  
Irvine, California 92619-1718

FEDERAL FACILITY AGREEMENT (FFA) SCHEDULE FOR OPERABLE UNIT (OU)-3,  
INSTALLATION RESTORATION PROGRAM (IRP) SITE 1, MARINE CORPS AIR  
STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed your letter dated February 19, 2002 requesting an extension to the deadline for OU-3, IRP Site 1, as set forth in Appendix A of the FFA for MCAS El Toro. The extension request is made pursuant to Section 9.2 (g) of the FFA.

As indicated in your letter, a one-year extension is needed to submit the draft Remedial Investigation (RI) report for IRP Site 1. The Department of the Navy (DON) has requested that the submittal date for the draft RI report change from February 19, 2002 to February 19, 2003. The most significant impact to the schedule resulted from the development of an Ordnance and Explosive Range Evaluation Work Plan (Work Plan) and the associated public comment period. The Work Plan was necessary to meet the substantive requirements of a Removal Action Work Plan (RAW) and the conditions specified in California Health and Safety Code section 25358.9(a) for exclusion from hazardous waste facility permit requirements.

The letter also mentioned that "we [Department of the Navy (DON)] project an expedient completion of the required CERCLA [Comprehensive Environmental Response, Compensation, and Liability Act] Process and associated documentation."

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

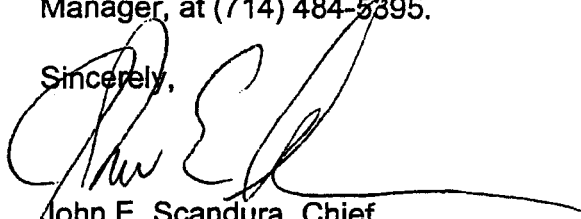
Mr. Dean Gould  
February 27, 2002  
Page 2

For clarification, DTSC acknowledges that DON has chosen to incorporate State substantive closure and post-closure requirements as relevant and appropriate requirements in the CERCLA response at Site 1. This information was provided in Section 1.1 of the RI Work Plan (Earth Tech, Inc., November 2001). This decision, made by the DON, facilitated a settlement of the differing positions on whether treatment of explosive ordnance occurred at an open burn/open detonation (OB/OD) unit within Site 1. Further, a cross reference table based on the DTSC Treatment and Storage Facility Closure Plan checklist was included in the RI Work Plan. The checklist is consistent with the intent of a proposed settlement and indicates where specific closure requirements will be addressed in the CERCLA process. DTSC anticipates that use of this checklist will continue in future documents. Additionally, the DTSC Hazardous Waste Management Program, Permitting Division will continue to work with the Site Mitigation Program, Office of Military Facilities to ensure that hazardous waste closure and post-closure requirements for the OB/OD unit are incorporated into the CERCLA response process.

While DTSC grants the DON request for extension to the FFA schedule, DTSC is nonetheless concerned about the schedule delays associated with Site 1. Considering the current and previous extension request, dated October 19, 2000, the submittal of the RI report has now been delayed approximately 3 years. As such, DTSC maintains that DON must adhere to this new schedule, any further extension requests related to Site 1 activities will be closely scrutinized by DTSC.

If you have any questions, please contact Ms. Triss Chesney, Remedial Project Manager, at (714) 484-5395.

Sincerely,



John E. Scandura, Chief  
Southern California Branch  
Office of Military Facilities

cc: Ms. Nicole Moutoux  
Remedial Project Manager  
U. S. Environmental Protection Agency Region IX  
Superfund Division (SFD-8-1)  
75 Hawthorne Street  
San Francisco, California 94105-3901

Mr. Dean Gould  
February 27, 2002  
Page 3

cc: Ms. Patricia Hannon  
Remedial Project Manager  
California Regional Water Quality Control Board  
Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, California 92501-3339

Mr. Jerry Werner  
Restoration Advisory Board Co-chair  


Ms. Marcia Rudolph  
Restoration Advisory Board Subcommittee Chair  


Ms. Polin Modanlou  
Environmental Remediation Manager  
MCAS El Toro Local Redevelopment Authority  
Building 83  
P.O. Box 53010  
Irvine, California 92619-3010

Mr. Steven Sharp  
Orange County Health Care Agency  
2009 East Edinger Avenue  
Santa Ana, California 92705

Ms. Content Arnold  
Remedial Project Manager  
Naval Facilities Engineering Command  
Southwest Division - Code 06CC.CA  
1220 Pacific Highway  
San Diego, California 92132-5187

Mr. Dean Gould  
February 27, 2002  
Page 4

cc: Mr. Gordon Brown  
Remedial Project Manager  
Naval Facilities Engineering Command  
Southwest Division - Code 06CC.GB  
1220 Pacific Highway  
San Diego, California 92132-5187

Ms. Karen Baker  
Branch Chief  
Geology and Corrective Action Branch  
Department of Toxic Substances Control  
5796 Corporate Avenue  
Cypress, California 90630



## Department of Toxic Substances Control



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Edwin F. Lowry, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200

Gray Davis  
Governor

August 21, 2003

Ms. Laura Duchnak  
BRAC Operations Officer  
Base Realignment and Closure  
1220 Pacific Highway  
San Diego, California 92132-5190

Dear Ms. Duchnak:

This letter is in response to your correspondence to Mr. John Scandura, Southern California Office of Military Facilities Branch Chief, dated July 2, 2003, relating to the proposed public sale of a large portion of the Marine Corps Air Station (MCAS) El Toro Facility. As you know, the Department of Toxic Substances Control (DTSC) did not receive your letter until on or about July 22, 2003. Your letter suggests that there are "unique factors" at MCAS El Toro that would render the requirements to follow the Resource Conservation and Recovery Act (RCRA) as "unnecessary." You reference specific language in the MCAS El Toro Federal Facility Agreement (FFA) and RCRA Part B Permit that supports an exercise of the State's discretion not to pursue a permit modification for any proposed transfer of the facility.

The July 2, 2003, letter appears to represent a significant departure from the position taken in your letter of March 6, 2003, relating to the Navy's continuing obligations to comply with the California Hazardous Waste Control Act, RCRA and the implementing regulations. In that letter, you state that the FFAs and the Federal Facilities Site Remediation Agreements (FFSRAs) at Navy and Marine Corps BRAC installations do not relieve any RCRA obligations and that the Navy will conduct the appropriate procedures needed to determine that the Navy's corrective action obligations are complete.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

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Ms. Laura Duchnak  
August 21, 2003  
Page 2

A review of the "unique factors" presented at MCAS El Toro again suggests that DTSC has never expressed any intention of abrogating or eliminating RCRA requirements at hazardous waste facilities. In this case, the FFA predates the Hazardous Waste Facility Permit issued in August 1993. The FFA specifically recognizes that the Navy is subject to any permitting requirements for hazardous waste management activities. (See FFA, Section 19, p. 35.) Your letter indicates that only upon termination of the FFA do permit modification procedures become applicable. However, the permit has several references to the requirements to modify the permit following the applicable RCRA and State law requirements (see, Permit, Sections II.A.1, II.E, II.M.2). In addition, the Permit expressly provides that the FFA is not intended in any way to modify DTSC's rights with respect to corrective action and that the FFA and any schedules contained in the FFA are incorporated by reference into the Permit as required by RCRA. (See Permit, Sections V.A.1 & 2.)

DTSC agrees the FFA process provides opportunities for public participation in the corrective action termination decision. However, unless the requirements for permit modifications are specifically folded into the Comprehensive Environmental Response, Compensation, and Liability Act process, there is no certainty and finality to permittees, transferees and regulators, as well as for the public. As a State authorized to carry-out its own hazardous waste program, California continues to assert that such modifications are an integral step in outlining and clarifying present and future corrective action obligations.

DTSC welcomes the opportunity to work closely in coordinating and streamlining the proposed public sale. As already demonstrated at other military installations, early coordination and communication is instrumental in ensuring that all the applicable State and federal requirements are met. If you have any questions regarding this issue, please feel free to contact me at (916) 255-6416, or Ms. Nancy Long, Office of Legal Counsel, at (916) 324-3154.

Sincerely,



Frederick S. Moss  
Division Chief  
Office of Military Facilities

cc: See next page

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4  
245 West Broadway, Suite 425  
T Beach, CA 90802-4444



March 8, 1996

Mr. Dennis M. Bevis  
Lieutenant Colonel, U.S. Marine Corps  
Deputy Assistant Chief of Staff  
Environment and Safety  
Headquarters Marine Corps Air Station El Toro  
P.O. Box 95001  
Santa Ana, California 92709-5001

Dear Colonel Bevis:

**ACCEPTANCE OF CLOSURE CERTIFICATION: HAZARDOUS WASTE STORAGE AREA  
(BUILDING 673-T3), MARINE CORPS AIR STATION EL TORO, SANTA ANA,  
CALIFORNIA (EPA ID NO. CA6170023208)**

The Department of Toxic Substances Control (DTSC) has reviewed the Final Closure Certification Report for a hazardous waste container storage area at Marine Corps Air Station (MCAS) El Toro, dated November 1995. The Closure Certification Report certifies that you have closed the subject hazardous waste container storage area in accordance with the DTSC approved Closure Plan which was part of the Resource Conservation and Recovery Act (RCRA) Permit issued in August 1993. The DTSC hereby accepts the closure certification report and considers the container storage area (Building 673-T3) closed. Issuance of this letter terminates the RCRA Permit and MCAS El Toro shall cease storing hazardous waste in Building 673-T3 for periods greater than ninety (90) days.

The DTSC's acceptance does not certify that the hazardous waste storage area will not pose an environmental or public health threat. Neither does this acceptance release you from any liabilities associated with past hazardous waste management practices which occurred at your facility. Pursuant to the Health and Safety Code, Section 25187, the DTSC may issue an order specifying corrective action if the DTSC determines that there has been a release of hazardous waste or constituents into the environment from any solid waste management units or areas at



Mr. Dennis Bevis  
March 8, 1996  
Page 2

a hazardous waste facility from which hazardous constituents might migrate, irrespective of whether the units or areas were intended for the management of wastes.

If you have any questions regarding this matter, please contact Mr. Tayseer Mahmoud at (310) 590-4891.

Sincerely,



Mohinder S. Sandhu, P.E., Chief  
Facility Permitting Branch

cc: Mr. John C. Scandura, Chief  
Southern California Operations  
Office of Military Facilities  
Department of Toxic Substances Control  
245 West Broadway, Suite 350  
Long Beach, California 90802-4444

Ms. Paula Bisson, Chief  
Permits Section  
Hazardous Waste Management Division (H-3-1)  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, California 94105

Mr. Scott Simpson, Chief  
Statewide Compliance Branch  
Department of Toxic Substances Control  
245 West Broadway, Suite 350  
Long Beach, California 90802-4444



## Department of Toxic Substances Control



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Edwin F. Lowry, Director  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721

Gray Davis  
Governor

February 11, 2003

Michael E. McClelland  
BRAC Environmental Coordinator  
Department of the Navy  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5190

**CLARIFICATION OF PERMIT TERMINATION, DEPARTMENT OF THE NAVY,  
NAVAL SUPPLY CENTER OAKLAND, ALAMEDA FACILITY, BUILDING 5,  
ALAMEDA, CALIFORNIA, EPA ID No: CA1 170 090 012**

Dear Mr. McClelland:

Thank you for your letter dated December 18, 2002 regarding the former permitted unit, Building 5, within the Naval Supply Center Oakland, Alameda Facility. The specific issues raised in your letter are:

1. Is the July 1993 permit issued by DTSC for the operation of storage of hazardous wastes at Building 5 still in effect?
2. Is the Department of the Navy required to submit a permit renewal application?
3. Will all remaining facility-wide cleanup issues be handled under the oversight of DTSC's Office of Military Facilities Program in accordance with the Federal Facility Site Remediation Agreement (FFSRA)?

As noted in your letter, all hazardous waste management activities at Building 5 have ceased. DTSC approved the clean closure certification report for Building 5 in a letter dated June 9, 1999. Since the only remaining RCRA obligations pertain to facility-wide corrective action, there is no requirement to submit a permit renewal application.

As stated in Section 6.1 of the FFSRA, "The Navy may discharge some or all of its RCRA corrective action obligations . . . through CERCLA response actions." However, the FFSRA is not intended to in any way relieve the Navy from its obligation to comply with any of the applicable provisions of the HWCL or its implementing regulations, RCRA or its implementing regulations, or any other RCRA permitting requirement.

It is the understanding of the Permitting Division of DTSC that RCRA Corrective Action


Michael McClelland  
February 11, 2003  
Page 2

requirements for facility-wide cleanup are being addressed by DTSC's Office of Military Facilities (OMF) in accordance with the FFSRA . Also, all remaining cleanup issues will be handled by OMF, including the termination of RCRA Corrective Action in a manner that meets RCRA and Hazardous Waste Control Act requirements for facility-wide cleanup.

Finally, since the City of Alameda is now the owner of the portion of the facility at issue, at the appropriate time, a permit modification will be required to reflect the change in the ownership of the facility.

If you have any questions, please contact me at 510/540-3974.

Sincerely,

  
Mohinder S. Sandhu, P.E., Chief  
Standardized Permits and Corrective Action Branch

cc: Rick Moss, Chief  
Permitting Division  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95814

Elizabeth Johnson  
950 W. Mall Square, Building 1  
Alameda Point  
Alameda, California 94501

Debbie Potter  
950 W. Mall Square, Building 1  
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Anthony Landis, Chief  
Northern California Operations Branch  
Office of Military Facilities  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, California 95826

cc: OGC. RC  
OGC. AA  
AL (LOANE SILVA) - 3 copies  
WJ 3/21

Michael McClelland  
February 11, 2003  
Page 3

Nancy Long  
Office of Legal Counsel  
Department of Toxic Substances Control  
P.O. Box 806, Sacramento, California 95814



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

## Department of Toxic Substances Control

Edwin F. Lowry, Director  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721



Gray Davis  
Governor

June 30, 2003

Jerry Dunaway  
U.S. Department of the Navy  
Southwest Division  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5190

### **CLASS 1\* PERMIT MODIFICATION, MARE ISLAND NAVAL SHIPYARD, VALLEJO, CALIFORNIA, EPA ID# CA7 170 024 775**

Dear Mr. Dunaway:

The U.S. Department of the Navy (the Navy) on May 17, 2002, requested a Class 1\* modification to the Hazardous Waste Facility Permit issued to the Mare Island Naval Shipyard, Vallejo, California. The request was to exclude two parcels, the Eastern Early Transfer Parcel (EETP) and the Western Early Transfer Parcel (WETP) from the permitted facility boundary. The Navy mailed the notice of Class 1\* Permit Modification to persons on the facility's mailing list and placed the notice on Times-Herald, a local newspaper in the City of Vallejo, on May 23, 2002.

The Department of Toxic Substances Control (DTSC) prepared a Notice of Exemption to comply with the California Environmental Quality Act and approved the request based on the following information:

1. Three permitted hazardous waste management units, namely, Building 759 and Building 213 which were on EETP, and Building A-195, were certified clean closed.
2. There were no permitted units on WETP.
3. Corrective Action required under Chapter 6.5 of California Health and Safety Code for Solid Waste Management Units on parcels retained by the Navy will be completed under the "Federal Facility Site Remediation Agreement", dated July 15, 2002, between the Department of Toxic Substances Control (DTSC) and the U.S. Department of the Navy.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

Jerry Dunaway  
June 30, 2003  
Page 2

4. Corrective Action required under Chapter 6.5 of California Health and Safety Code for Solid Waste Management Units on EETP will be completed under the Consent Agreement between City of Vallejo, Lennar Mare Island, and DTSC, signed on April 16, 2001.
5. Corrective Action required under Chapter 6.5 of California Health and Safety Code for Solid Waste Management Units located on WETP will be completed under the Consent Agreement among Weston Solutions, Inc., City of Vallejo, State Lands Commission, and DTSC, signed on July 15, 2002.

Enclosed please find a copy of the modified permit and a redline and strike version of the modified permit. If you have any questions, please call Ms. Wei-Wei Chui of my staff at 510 540-3975.

Sincerely,



Mohinder S. Sandhu, P.E. Chief

Standardized Permits and Corrective Action Branch

Two Enclosures

cc (with enclosures):

Daniel E. Murphy, P.E.  
Section Chief  
Office of Military Facilities  
Department of Toxic Substances Control  
700 Heinz Avenue  
Berkeley, California 94710





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## Coordination between RCRA Corrective Action and Closure and CERCLA Site Activities



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

SEP 24 1996

#### SUBJECT:

Coordination between RCRA Corrective Action and Closure and CERCLA Site Activities

#### FROM:

Steven A. Herman  
Assistant Administrator  
Office of Enforcement and Compliance Assurance  
United States Environmental Protection Agency

Elliott P. Laws  
Assistant Administrator  
Office of Solid Waste and Emergency Response  
United States Environmental Protection Agency

#### TO:

RCRA/CERCLA National Policy Managers  
Regions I-X Agency

Good RCRA/CERCLA coordination has become increasingly important as our offices have reorganized and programs have assumed new organizational relationships. We believe that, in general, coordination of site cleanup activities among EPA RCRA, EPA CERCLA and state/tribal cleanup programs has improved greatly; however, we are aware of examples of some remaining coordination difficulties. In this memo, we discuss three areas: acceptance of decisions made by other remedial programs; deferral of activities and coordination among EPA RCRA, EPA CERCLA and state/tribal cleanup programs; and coordination of the specific standards and administrative requirements for closure of RCRA regulated units with other cleanup activities. We also announce a revision to the Agency's policy on the use of fate and transport calculations to meet the "clean closure" performance standard under RCRA. We hope the guidance

offered here will assist in your continuing efforts to eliminate duplication of effort, streamline cleanup processes, and build effective relationships with the states and tribes.

This memorandum focuses on coordination between CERCLA and RCRA cleanup programs; however, we believe the approaches outlined here are also applicable to coordination between either of these programs and certain state or tribal cleanup programs that meet appropriate criteria. For example, over half of the states have "Superfund-like" authorities. In some cases, these state authorities are substantially equivalent in scope and effect to the federal CERCLA program and to the state or federal RCRA corrective action program. In accordance with the 1984 Indian Policy, EPA recognizes tribes as sovereign nations, and will work with them on a government-to-government basis when coordination cleanup efforts on lands under tribal jurisdiction.

In addition to the guidance provided in this memorandum, two other on-going initiatives address coordination of RCRA and CERCLA. First, EPA is currently coordinating an interagency and state "Lead Regulator Workgroup." This workgroup intends to provide guidance where overlapping cleanup authorities apply at federal facilities that identifies options for coordinating oversight and deferring cleanup from one program to another. We intend for today's memorandum and the pending guidance from the Lead Regulator Workgroup to work in concert to improve RCRA/CERCLA integration and coordination. Second, EPA has also requested comment on RCRA/CERCLA integration issues in the May 1, 1996 Advanced Notice of Proposed Rulemaking--Corrective Action for Releases From Solid Waste Management Units at Hazardous Waste Management Facilities (61 FR 19432; commonly referred to as the RCRA "Subpart S" ANPR). We intend to coordinate all of these efforts as we develop further policy on integration issues.

#### *Acceptance of Decisions Made by Other Remedial Programs*

Generally, cleanups under RCRA corrective action or CERCLA will substantively satisfy the requirements of both programs. FOOTNOTE 1. We believe that, in most situations, EPA RCRA and CERCLA site managers can defer cleanup activities for all or part of a site from one program to another with the expectation that no further cleanup will be required under the deferring program. For example, when investigations or studies have been completed under one program, there should be no need to review or repeat those investigations or studies under another program. Similarly, a remedy that is acceptable under one program should be presumed to meet the standards of the other.

It has been our experience that, given the level of site-specific decision-making required for cleaning up sites, differences among the implementation approaches of the various remedial programs primarily reflect differences in professional judgement rather than structural inconsistencies in the programs themselves. Where there are differences in approaches among remedial programs, but not in their fundamental purposes or objectives (e.g., differences in analytical QA/QC procedures), these differences should not necessarily prevent deferral. We encourage program implementers to focus on whether the end results of the remedial activities are substantively similar when making deferral decisions and to make every effort to resolve differences in professional judgement to avoid imposing two regulatory programs.

We are committed to the principle of parity between the RCRA corrective action and CERCLA programs and to the idea that the program should yield similar remedies in similar circumstances. To further this goal, we have developed and continue to develop a number of joint (RCRA/CERCLA) guidance documents. For example, the several "Presumptive Remedies," which are preferred technologies for common categories of sites, and the Guidance for Evaluating the Technical Impracticability of Groundwater Restoration (OSWER Directive 9234.2-25, September 1993), which recognizes the impracticability of achieving groundwater restoration at certain sites, are applicable to both RCRA and CERCLA cleanups. For more information on the concept of parity between the RCRA and CERCLA program see: 54 FR 41000, esp. 41006-41009 (October 4, 1989), RCRA deferral policy; 54 FR 10520 (March 13, 1989), National Priorities List for Uncontrolled Hazardous Waste Sites Listing Policy for Federal Facilities; 55 FR, 30798, esp. 30852-30853 (July 27, 1990), Proposed Rule for Corrective Action for Solid Waste Management Units at Hazardous Waste Management Facilities; 60 FR 14641 (March 20, 1995), Deletion Policy for RCRA Facilities; and, 61 FR 19432 (May 1, 1996), Corrective Action for Releases From Solid Waste Management Units at Hazardous Waste Management Facilities, Advanced Notice of Proposed Rulemaking.

#### *Program Deferral*

The concept of deferral from one program to another is already in general use at EPA. For example, it has long been EPA's policy to defer facilities that may be eligible for inclusion on the National Priorities List (NPL) to the RCRA program if they are subject to RCRA corrective action (unless they fall within certain exceptions, such as federal facilities). Recently, EPA expanded on this policy by issuing criteria for deleting sites that are on the NPL and deferring their cleanup to RCRA corrective action (attached). **FOOTNOTE 2.** When a site is deleted from the NPL and deferred to RCRA, problems of jurisdictional overlap and duplication of effort are eliminated, because the site will be handled solely under RCRA authority. Corrective action permits or orders should address all releases at a CERCLA site being deferred to RCRA; some RCRA permits or orders may need to be modified to address all releases before a site is deleted from the NPL.

While EPA's general policy is for facilities subject to both CERCLA and RCRA to be cleaned up under RCRA, in some cases, it may be more appropriate for the federal CERCLA program or a state/tribal "Superfund-like" cleanup program to take the lead. In these cases, the RCRA permit/order should defer corrective action at all of the facility to CERCLA or a state/tribal cleanup program. For example, where program priorities differ, and a cleanup under CERCLA has already been completed or is underway at a RCRA facility, corrective action conditions in the RCRA permit/order could state that the existence of a CERCLA action makes separate RCRA action unnecessary. In this case, there would be no need for the RCRA program to revisit the remedy at some later point in time. Where the CERCLA program has already selected a remedy, the RCRA permit could cite the CERCLA decision document (e.g., ROD), but would not necessarily have to incorporate that document by reference. RCRA permits/orders can also defer corrective action in a similar way for cleanups undertaken under state/tribal programs provided the state/tribal action protects human health and the environment to a degree at least equivalent to that required under the RCRA program.

Superfund policy on deferral of CERCLA sites for listing on the NPL while states and tribes oversee response actions is detailed in the May 3, 1995 OSWER Directive 9375.6-11 ("Guidance on Deferral of NPL Listing

Determinations While States Oversee Response Actions"). The intent of this policy is to accelerate the rate of response actions by encouraging a greater state or tribal role, while maintaining protective cleanups and ensuring full public participation in the decision-making process. Once a deferral response is complete, EPA will remove the site from CERCLIS and will not consider the site for the NPL unless the Agency receives new information of a release or potential release that poses a significant threat to human health or the environment. The state and tribal deferral policy is available for sites not listed on the NPL; deferral of final NPL sites must be addressed under the Agency's deletion policy, as described above.

#### *Coordination Between Programs*

While deferral from one program to another is typically the most efficient and desirable way to address overlapping cleanup requirements, in some cases, full deferral will not be appropriate and coordination between programs will be required. The goal of any approach to coordination of remedial requirements should be to avoid duplication of effort (including oversight) and second-guessing of remedial decisions. We encourage you to be creative and focus on the most efficient path to the desired environmental result as you craft strategies for coordination of cleanup requirements under RCRA and CERCLA and between federal and state/tribal cleanup programs.

Several approaches for coordination between programs at facilities subject to both RCRA and CERCLA are currently in use. It is important to note that options for coordination at federal facilities subject to CERCLA §120 may differ from those at non-federal facilities because of certain prescriptive requirements under §120. EPA anticipates issuing further guidance on coordination options specific to federal facilities through the interagency Lead Regulator Workgroup. Current approaches that are in use include:

- *Craft CERCLA or RCRA decision documents so that cleanup responsibilities are divided.* CERCLA and RCRA decision documents do not have to require that the entire facility be cleaned up under one or the other program. For example, at some facilities being cleaned up under CERCLA, the RCRA units (regulated or solid waste) are physically distinct and could be addressed under RCRA. In these cases, the CERCLA decision documents can focus CERCLA activities on certain units or areas, and designate others for action under RCRA. When units or areas are deferred from CERCLA to RCRA, the CERCLA program should include a statement (e.g., in a ROD or memorandum submitted to the administrative record) that successful completion of these activities would eliminate the need for further cleanup under CERCLA at those units and minimal review would be necessary to delete the site from the NPL. Similarly, when units or areas are deferred from RCRA to CERCLA, RCRA permits or orders can reference the CERCLA cleanup process and state that complying with the terms of the CERCLA requirements would satisfy the requirements of RCRA.
- *Establish timing sequences in RCRA and CERCLA decision documents.* RCRA and CERCLA decision documents can establish schedules according to which the requirements for cleanup at all or part of a facility under one authority would be determined only after completion of an action under the other authority. For examples RCRA permits/orders can establish schedules of compliance which allow decisions as to whether corrective action is required to be

made after completion of a CERCLA cleanup or a cleanup under a state/tribal authority. After the state or CERCLA response is carried out, there should be no need for further cleanup under RCRA and the RCRA permit/order could simply make that finding. Similarly, CERCLA or state/tribal cleanup program decision documents could delay review of units or areas that are being addressed under RCRA, with the expectation that no additional cleanup will need to be undertaken pending successful completion of the RCRA activities, although CERCLA would have to go through the administrative step of deleting the site from the NPL.

A disadvantage of this approach is that it contemplates subsequent review of cleanup by the deferring program and creates uncertainty by raising the possibility that a second round of cleanup may be necessary. Therefore, we recommend that program implementers look first to approaches that divide responsibilities, as described above. A timing approach, however, may be most appropriate in certain circumstances, for example, where two different regulatory agencies are involved. Whenever a timing approach is used, the final review by the deferring program will generally be very streamlined. In conducting this review, there should be a strong presumption that the cleanup under the other program is adequate and that reconsidering the remedy should rarely be necessary.

The examples included in this memo demonstrate several possible approaches to deferring action from one cleanup program to another. For example, under RCRA, situations are described where the RCRA corrective action program would make a finding that no action is required under RCRA because the hazard is already being addressed under the CERCLA Program, which EPA believes affords equivalent protection. In other examples, the RCRA program defers not to the CERCLA program *per se*, but either defers to a particular CERCLA ROD or actually incorporates such ROD by reference into a RCRA permit or order. In addition, there are examples where the Agency commits to revisit a deferral decision once the activity to which RCRA action is being deferred is completed; in other situations, reevaluation is not contemplated. As discussed in this memorandum, no single approach is recommended, because the decision of whether to defer action under one program to another and how to structure such a deferral is highly dependent on site-specific and community circumstances. In addition, the type of deferral chosen may raise issues concerning, for example, the type of supporting documentation that should be included in the administrative record for the decision, as well as issues concerning availability and scope of administrative and judicial review.

Agreements on coordination of cleanup programs should be fashioned to prevent revisiting of decisions and should be clearly incorporated and cross-referenced into existing or new agreements, permits or orders. We recognize that this up-front coordination requires significant resources. Our expectation is that, over the long-term, duplicative Agency oversight will be reduced and cleanup efficiency will be enhanced.

#### *RCRA Closure and Post-Closure*

Some of the most significant RCRA/CERCLA integration issues are associated with coordination of requirements for closure of RCRA regulated units <sup>FOOTNOTE 3</sup> with other cleanup activities. Currently, there are regulatory distinctions between requirements for closure of RCRA regulated units and other cleanup requirements (e.g., RCRA corrective action

requirements). RCRA regulated units are subject to specific standards for operation, characterization of releases, groundwater corrective action and closure. Coordination of these standards with other remedial activities can be challenging. In the November 8, 1994 proposed Post-Closure Rule (59 FR 55778), EPA requested comment on an approach that would reduce or eliminate the regulatory distinction between cleanup of releases from closed or closing regulated units and cleanup of non-regulated unit releases under RCRA corrective action. The Office of Solid Waste will address this issue further in the final Post-Closure and Subpart S rules.

At the present time, however, the dual regulatory structure for RCRA closure and other cleanup activities remains in place. There are several approaches program implementers can use to reduce inconsistency and duplication of effort when implementing RCRA closure requirements during CERCLA cleanups or RCRA corrective actions. These approaches are analogous to the options discussed above for coordination between cleanup programs. For example, a clean-up plan for a CERCLA operable unit that physically encompasses a RCRA regulated unit could be structured to provide for concurrent compliance with CERCLA and the RCRA closure and post-closure requirements. In this example, the RCRA permit/order could cite the ongoing CERCLA cleanup, and incorporate the CERCLA requirements by reference. RCRA public participation requirements would have to be met for the permit/order to be issued; however, at many sites it may be possible to use a single process to meet this need under RCRA and CERCLA.

At some sites, inconsistent cleanup levels have been applied for removal and decontamination ("clean closure") of regulated units and for site-wide remediation under CERCLA or RCRA corrective action. Where this has happened, clean closure levels have been generally set at background levels while, at the same site, cleanup levels have been at higher, risk-based concentrations. To avoid inconsistency and to better coordinate between different regulatory programs, we encourage you to use risk-based levels when developing clean closure standards. The Agency has presented its position on the use of background and risk-based levels as clean closure standards (52 FR 8704-8709, March 19, 1987; attached). This notice states that clean closure levels are to be based on health-based levels approved by the Agency. If no Agency-approved level exists, then background concentrations may be used or a site owner may submit sufficient data on toxicity to allow EPA to determine what the health-based level should be.

EPA continues to believe, as stated in the March 19, 1987 notice, that risk-based approaches are protective and appropriate for clean closure determinations. In EPA's view, a regulatory agency could reasonably conclude that a regulated unit was clean closed under RCRA if it was cleaned up under Superfund, RCRA corrective action, or certain state/tribal cleanup programs to the performance standard for clean closure. This performance standard can be met with the use of risk-based levels. RCRA units that did not achieve the closure performance standard under a would remain subject to RCRA capping and post-closure care requirements.

The 1987 federal register notice described EPA's policy that the use of fate and transport models to establish risk levels would be inappropriate for clean closure detections. This discussion, however, also included the statement that, after additional experience with clean closures, "the Agency may decide that a less stringent approach is sufficiently reliable to assure that closures based on such analyses are fully protective of human health and the environment." After nine years of further experience, EPA believes

that, consistent with the use of risk-based standards in its remedial programs, use of fate and transport models to establish risk levels can be appropriate to establish clean closure determinations. EPA today announces that it is changing its 1987 policy on evaluating clean closure under RCRA to allow use of fate and transport models to support clean closure demonstrations. EPA intends to publish this change in the Federal Register in the near future.

We encourage you to consider risk-based approaches when developing cleanup levels for RCRA regulated units and to give consideration to levels set by state/tribal programs which use risk-based approaches. EPA is developing guidance on risk-based clean closure and on the use of models to meet the clean closure performance standard.

Since almost all states oversee the closure/post-closure process and more than half implement RCRA corrective action, coordination of RCRA corrective action and closure will often be solely a state issue. However, if a state is not authorized for corrective action, or if a facility is subject to CERCLA as well as RCRA corrective action, close coordination between federal and state agencies will be necessary. As discussed above, actual approaches to coordination or deferral at any site should be developed in consideration of site-specific and community concerns.

#### *Summary*

We encourage you to continue your efforts to coordinate activities between the RCRA and CERCLA programs and between state, tribal and federal cleanup programs. We are aware that several of the EPA Regions are considering developing formal mechanisms to ensure that coordination will occur among these programs. We endorse these efforts and encourage all Regions, states and tribes to consider the adoption of mechanisms or policies to ensure coordination. If you have any questions on the issues discussed in this memorandum, or on other RCRA/CERCLA issues, please call Hugh Davis at (703)308-8633.

#### *Attachments*

##### **cc:**

Craig Hooks, FFEO  
 Barry Breen, OSRE  
 Robert Van Heuvelen, ORE  
 Steve Luftig, OERR  
 Michael Shapiro, OSW  
 Jim Woolford, FFRRO  
 Regional RCRA Branch Chiefs  
 Regional CERCLA Branch Chiefs  
 Federal Facilities Leadership Council  
 Tom Kennedy, Association of States and Territorial Solid Waste Management Officials  
 Robert Roberts, Environmental Council of States  
 John Thomasian, National Governors Association  
 Brian Zwit, National Association of Attorneys General

- 
1. In a few, limited cases, program differences may be sufficiently great to prevent deferral to the other program (e.g., the inability of CERCLA to address petroleum releases or RCRA to address certain

radioactive materials). In these instances we encourage remedial programs to coordinate closely with each other to minimize duplication of effort, including oversight. [Return to Document](#)

2. Currently, the RCRA deletion policy does not pertain to federal facilities, even if such facilities are also subject to Subtitle C of RCRA. Site Managers are encouraged to use interagency agreements to eliminate duplication of effort at federal facilities; the Lead Regulator Workgroup intends to provide additional guidance on coordinating oversight and deferring cleanup from one program to another at federal facilities. [Return to Document](#)
3. In this document the term "regulated unit" refers to any surface impoundment, waste pile, land treatment unit or landfill that receives (or has received) hazardous waste after July 26, 1982 or that certified closure after January 26, 1983. [Return to Document](#)

#### **Links to Relevant Code of Federal Regulations (CFR)**

- Vol. 60. No. 53. Monday, March 20, 1995, 40 CFR Part 300
  - [The National Priorities List for Uncontrolled Hazardous Waste Sites; Deletion Policy for Resource Conservation and Recovery Act Facilities](#)
  - [The National Oil and Hazardous Substances Contingency Plan; National Priorities List Update](#)
- Vol. 52. No. 53. Thursday, March 19, 1987, 40 CFR Part 265
  - [Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities; Final Rule](#) [\[EXIT disclaimer\]](#)

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Last updated on Wednesday, October 2nd, 2002  
URL: <http://www.epa.gov/swerffrr/documents/924memo.htm>





Winston H. Hickox  
Agency Secretary  
California Environmental  
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## Department of Toxic Substances Control

Edwin F. Lowry, Director  
5796 Corporate Avenue  
Cypress, California 90630



Gray Davis  
Governor

September 25, 2003

Mr. F. Andrew Piszkin  
BRAC Environmental Coordinator  
Base Realignment and Closure  
Marine Corps Air Station El Toro  
7040 Trabuco Road  
Irvine, California 92618

FINAL ENVIRONMENTAL BASELINE SURVEY (EBS), FORMER MARINE CORPS  
AIR STATION (MCAS) EL TORO, EL TORO, CALIFORNIA

Dear Mr. Piszkin:

The Department of Toxic Substances Control (DTSC) has reviewed the subject document dated September 12, 2003 and received by our office on September 15, 2003. Based on our review, the Navy has adequately addressed our comments and we concur with the findings of this EBS.

If you have any questions, please contact Rafat Abbasi at (714) 484-5449.

Sincerely,

John Scandura, Chief  
Office of Military Facilities  
Southern California Branch

cc: Ms. Nicole Moutoux  
Remedial Project Manager  
U. S. Environmental Protection Agency Region IX  
Superfund Division (SFD-8-1)  
75 Hawthorne Street  
San Francisco, California 94105-3901

**received**  
9/29/03

Mr. Andrew F. Piszkin  
September 25, 2003  
Page 2

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**DEPARTMENT OF THE NAVY**  
SOUTHWEST DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132 - 5190

5090  
Ser 09C.RC/0977  
July 2, 2003

Mr. John E. Scandura, Chief  
Southern California Branch  
Office of Military Facilities  
Department of Toxic Substances Control  
California Environmental Protection Agency  
5796 Corporate Avenue  
Cypress, CA 90603

Dear Mr. Scandura:

This letter is a follow-up to our discussions at the June 12, 2003 meeting between Southwest Division, Naval Facilities Engineering Command (SWDIV) managers, Mr. Rick Moss, Mr. Tony Landis, and yourself. As we discussed, the public sale of Marine Corps Air Station (MCAS) El Toro is a national priority for the senior leadership of the Department of Navy (DoN). We appreciate the support the regulatory team has been dedicating to this project and believe that resolution of the Resource Conservation and Recovery Act (RCRA) permit Corrective Action Completion determination at El Toro is pivotal.

DoN is intensively preparing for the public sale of a large portion of the MCAS El Toro facility in March of 2004. The SWDIV environmental and real estate staff is heavily involved in the effort. The Draft Final Environmental Baseline Survey (EBS), Draft Finding of Suitability for Transfer (FOST), and Draft Finding of Suitability to Lease (FOSL) are currently under review by USEPA and the State of California. DoN plans to issue those documents in final form on or about August 13, 2003. The property that is identified as being suitable for transfer in the FOST will be included in the public sale.

The General Services Administration (GSA) is assisting DoN in the preparation for and conduct of the sale. GSA plans to initiate an Internet public auction through publication of an Invitation for Bid (IFB) on the Internet in August of this year. DoN plans to use the proceeds from the sale to fund remediation at El Toro and other DoN BRAC installations.

There has been discussion between our organizations as to whether a RCRA permit modification will be required at MCAS El Toro to document the completion of RCRA corrective action. DTSC has invoked USEPA's "Final Guidance on Completion of Corrective Action Activities at RCRA Facilities" published at 68 Federal Register 8757 on February 25, 2003 as requiring a modification. As we explained at the June 12 meeting, DoN believes that there are unique factors at MCAS El Toro that render such action unnecessary. Mr. Moss expressed support for streamlining the process as effectively as possible and invited SWDIV to present those factors. This letter serves that purpose.

We have discussed the February 25, 2003 policy with USEPA staff. They have assured us that the policy does not mandate that the State require permit modifications at MCAS El Toro and that the State has flexibility and discretion in implementing the policy.

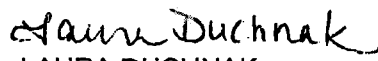
Although the policy indicates that permit modification procedures are generally appropriate, it also states "Of course, if a facility's permit or order provides otherwise, these procedures would not be appropriate at a facility." See Footnote 16 on Page 8763 of the policy. The policy also acknowledges that Federal Facilities such as MCAS El Toro present unique issues. See Page 8760 of the policy.

In summary, DoN believes that the specific language of MCAS El Toro Federal Facility Agreement (FFA) and RCRA Part B permit provisions that integrate RCRA corrective action and CERCLA requirements "provide otherwise" as provided by Footnote 16 of USEPA's policy. Furthermore, implementation of those integrated provisions over the past decade, the current draft EBS and FOST documentation and determinations, and completed and ongoing CERCLA and BRAC public participation efforts are additional unique factors that support the conclusions that USEPA's February 25, 2003 policy has been satisfied and that there is no need to engage in a permit modification process at MCAS El Toro. The Attachment to this letter sets forth a specific discussion of these unique factors. DoN believes that they support an exercise of the State's discretion not to pursue a permit modification.

DoN is quite concerned that the as-yet undefined permit modification process may create unnecessary redundancy with FFA and FOST work in progress, confuse the public, and disrupt the impending public sale, especially if a permit modification public comment period is open and the issues are not resolved with finality at the time of the auction. We would like to meet with you as soon as possible to resolve this issue.

Please contact Mr. Walter Sandza at (619) 532-1234 to make arrangements for the meeting or raise technical questions concerning this letter. Please contact Mr. Rex Callaway at (619) 532-0988, if you have any legal questions. We appreciate the continued support of you and your team to facilitate efficient and timely transfer of BRAC property.

Sincerely,

  
LAURA DUCHNAK  
BRAC Operations Officer  
Base Realignment and Closure

Attachment (with enclosures)

- Encl: (1) MCAS El Toro Federal Facility Agreement (September 1990)  
(2) MCAS El Toro RCRA Part B permit (June 1993)  
(3) Part B permit termination letter from Mr. Mohindur S. Sandhu (DTSC) to Lt. Col. Dennis M. Bevis (MCAS El Toro) of March 8, 1996  
(4) FFA IRP Site 1 letter from Mr. John E. Scandura (DTSC) to Mr. Dean Gould (MCAS El Toro) of February 27, 2002

5090  
Ser 09C.RC/0977  
July 2, 2003

Copy to:  
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Division Chief  
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Commandant of the Marine Corps  
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**MCAS El Toro:  
Unique Factors Relevant to Completion of RCRA Corrective Action Determinations**

The unique factors presented at MCAS El Toro are as follows:

**1. The MCAS El Toro FFA and RCRA Part B permit provide that the FFA shall address corrective action requirements.**

Marine Corps Air Station (MCAS) El Toro is a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) National Priorities List (NPL) site and has been the subject of a Federal Facility Agreement (FFA) among DoN, USEPA, and the State of California since 1990 (enclosure 1). MCAS El Toro is also subject to a RCRA Part B permit issued in June 1993 that addresses one regulated unit (Building 673-T3) as well as RCRA corrective action requirements for Solid Waste Management Units (SWMUs) (Enclosure 2). DoN has acknowledged the applicability of RCRA corrective action requirements at MCAS El Toro in the FFA and the RCRA Part B permit and still does so.

The FFA and RCRA permit both clearly provide that the FFA governs RCRA corrective action for SWMUs as well as CERCLA remedy selection and remedial action and institute a single integrated process to coordinate the integration of overlapping RCRA corrective action and CERCLA requirements. The FFA explicitly states that it serves as a RCRA corrective action order while it is in effect (Paragraph 3.1 of FFA). See also Paragraphs 1.1(b) and 17.1 of the FFA. The MCAS El Toro Part B permit incorporates the FFA by reference and specifically provides that: "The activities required by the Agreement [FFA] are intended to satisfy the corrective action requirements of RCRA section 3004(u) and (v), 42 U.S.C. Section 6924(u) and (v)." See Paragraph V.A.1 of the Part B permit.

The FFA and Part B permit exempt RCRA corrective action decisions from permit modification requirements. The RCRA Part B permit only specifically requires permit modifications for corrective action decisions, schedules, and modifications following termination of the governing FFA. See Paragraph V.B.1.c. and V.B.1.d of the Part B permit.

Clearly, these provisions of the MCAS El Toro FFA and RCRA Part permit "provide otherwise" at MCAS El Toro within the meaning of Footnote 16 on Page 8763 of USEPA's February 25, 2003 policy.

**2. The FFA process has addressed RCRA corrective action requirements over the past decade as required by the FFA and RCRA Part B permit.**

The implementation of the FFA and RCRA Part B permit over the past decade has been consistent with the legal framework. Investigation and cleanup of the regulated unit (Building 673-T3) has been completed. DTSC approved DoN's Closure Certification Report and purported to terminate the Part B permit in a letter from Mr. Mohindur S. Sandhu to Lt. Col. Dennis M. Bevis of March 8, 1996 (enclosure 3). Investigation and cleanup of actual and potential SWMUs is continuing under the FFA.

The FFA specifically identified several SWMUs that were initially classified as Installation Restoration Program (IRP) Sites at the time that the FFA was signed. See Appendix A of FFA. Investigations of and several important cleanup decisions addressing these initial IRP SWMUs have been made pursuant to the FFA over the past several years. DTSC verified that the FFA would address such sites in a letter of February 27, 2002 confirming that DoN and DTSC would address IRP Site 1 and substantive RCRA closure and post-closure requirements under the FFA (enclosure 4).

The RCRA permit defers to the FFA to address the process for identifying and managing potential and actual "new" SWMUs so long as the FFA remains in effect. The permit process for identification of new SWMUs set forth in Paragraph V.D of the RCRA Part B permit will not take effect until the FFA is terminated as provided by the last sentence of Paragraph V.A.2 of the permit. Appendix A of the FFA provides that sites that are identified in the RCRA Facility Assessment (RFA) process as requiring an Remedial Investigation/Feasibility Study (RI/FS) will be designated as IRP sites and moved into Operable Unit No. 4 under the FFA.

Consistent with these provisions of the FFA and RCRA Part B permit, DoN and the BRAC Cleanup Team (BCT) have reviewed literally hundreds of potential and actual sites that fall within the definition of SWMUs over the course of the last decade. These potential and actual SWMUs have been addressed in investigations that have satisfied the requirements for RFAs or the CERCLA equivalent Preliminary Assessment/Site Inspections (PA/SIs). These "non-IRP Site" potential and actual SWMUs are identified and addressed in the current Draft Final Environmental Baseline Survey (EBS) and Draft Finding of Suitability for Transfer (FOST) as various sub-categories of "non-IRP" Locations of Concern (LOCs). The EBS and FOST address DoN's obligations under Section 120(h) of CERCLA and Paragraph 28 of the FFA, summarize the decisions made over the years under the FFA process, and reference the supporting documents. The Final FOST will include specific language addressing completion of RCRA corrective action for all SWMUs at MCAS El Toro.

3. The FFA process has provided and will continue to provide opportunities for public participation in corrective action decisions that exceed those that would otherwise apply in a "pure" RCRA corrective action program.

The FFA process at MCAS El Toro has involved and continues to involve extensive participation by Federal and State regulatory agencies as well as the public. The BRAC Cleanup Team (BCT) and Restoration Advisory Board review and comment on documents produced during the remedy selection process and meet on a regular basis to discuss ongoing progress on cleanup issues. The public participation requirements of CERCLA and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) have been addressed and complied with.

The FFA also requires that DoN comply with the real property transfer requirements of Section 120(h) of CERCLA (Paragraph 28). The regulators and public have the opportunity to comment on draft Findings of Suitability for Transfer (FOSTs). Collectively, these public participation measures equal or exceed the level of public participation required for the RCRA permit modification process.

# California Environmental Protection Agency

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 4, LONG BEACH

## Hazardous Waste Facility Permit

Facility: United States Marine Corps  
Air Station El Toro  
Santa Ana, California 92709-5001

Property: United States Marine Corps  
Owner: Air Station El Toro  
Santa Ana, California 92710-5001

Operator: Marine Corps Air Station El Toro  
Santa Ana, California 92710-5001

EPA ID No. CA6170023208

Effective Date: August 18, 1993

Expiration Date: August 18, 2003

Pursuant to the California Health and Safety Code, this Hazardous Waste Facility Permit is hereby issued to United States Marine Corps Air Station El Toro. The State of California has received final authorization to implement its state hazardous waste program in lieu of the Federal Resource Conservation and Recovery Act (RCRA) program in California. Accordingly, this Permit will also serve as a RCRA-equivalent Permit to meet the requirements of 42 U.S.C. Section 6901 et seq.

The issuance of this Permit is subject to the conditions set forth in Attachment A which consists of 25 pages, which includes Attachments V-1.



*MSSandhu*

Mohinder S. Sandhu, P.E., Chief  
Facility Permitting Branch

Date: 6/30/93.



United States Marine Corps  
Air Station El Toro  
Hazardous Waste Permit

TABLE OF CONTENTS

ATTACHMENT A .....	1
I. DESCRIPTION OF FACILITY .....	1
A. Ownership, Operations, and Locations .....	1
B. Compliance with California Environmental Quality Act .....	2
II. GENERAL CONDITIONS .....	2
A. Effect of Permit .....	2
B. Consent of Entry by Department Representatives .....	4
C. Specific Conditions .....	4
D. Land Disposal Restrictions .....	5
E. Permit Action .....	5
F. Need to Halt or Reduce Activities .....	6
G. Severability .....	6
H. Permit Expiration .....	6
I. 24-Hour Reporting .....	6
J. Notice of Planned Physical Changes and Certification of Construction .....	6
K. Operation at Night .....	7
L. Part B Application (Operation Plan) of the Hazardous Waste Facility Permit Application .....	7
M. General Responsibilities of Operator .....	7

MCAS El Toro  
Hazardous Waste Facility Permit  
Table of Contents

N.	Signatory Requirements .....	9
O.	Waste Minimization Certification .....	10
P.	Waste Minimization Conditions .....	10
Q.	Option to Cease Operation .....	10
III.	SPECIAL CONDITIONS .....	11
A.	Prohibition of Disposal .....	11
B.	General Description of Authorized Waste and Storage Unit .....	11
C.	Permit and Prohibited Waste Identification .....	14
D.	Additional Specific Conditions .....	17
IV.	COMPLIANCE SCHEDULE .....	18
A.	Reporting .....	18
B.	Summary of Compliance Schedule .....	18
V.	CORRECTIVE ACTION .....	19
A.	Permit Provisions .....	19
B.	Corrective Action Permit Requirements .....	20
C.	Modifications of Corrective Action for Solid Waste Management Units .....	21
D.	Notification Requirements for and Assessment of Newly Identified Solid Waste Management Units .....	21
E.	Notification Requirements for Newly Discovered Releases at Solid Waste management Units .....	24
F.	Public Notification of Final RFI Report Availability .....	24

ATTACHMENT A

Hazardous Waste Facility Permit

United States Marine Corps Air Station El Toro  
Santa Ana, California 92709-5001

EPA ID No: CA6170023208

Part I - DESCRIPTION OF FACILITY

I.A. Ownership, Operations, and Location

Pursuant to Section 25200 of the California Health and Safety Code, this Hazardous Waste Facility Permit is hereby issued to United States Marine Corps Air Station (MCAS) - El Toro, the owner and operator of the facility. The MCAS - El Toro has applied to the California Environmental Protection Agency, Department of Toxic Substances Control (Department) for a Hazardous Waste Facility Permit. United States Marine Corps Air Station - El Toro, hereinafter called the "facility", operates one hazardous waste storage facility Building 673-T3, hereinafter called the "facility". MCAS - El Toro is located in Orange County, California, adjacent to Interstate Highway 5, at the intersection of Trabuco Road and Sand Canyon Avenue at latitude 33°40'33" north and longitude 117°43'30" west.

The facility is an on-site hazardous waste storage facility which generates hazardous waste from aviation maintenance and operations. The maximum allowable inventory in containers at the permitted container storage area is three hundred and seventy (370) 55-gallon drums. The facility also uses 6-gallon, 16-gallon, 30-gallon and 85-gallon, Department of Transportation (DOT), approved drums. The location of the container storage area is shown in Figure 1, Page 3 of this permit.

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

I.B. Compliance With California Environmental Quality Act (CEQA)

The Department has prepared an Initial Study to evaluate the potential impact of the proposed project to human health and the environment. Based on the findings in the Initial Study, the Department has determined that this particular project, as approved, will not have a significant deleterious effect on the environment. A Negative Declaration was completed in accordance with the California Environmental Act (Public Resources Code, Section 21000, et seq.) and the State guidelines.

PART II - GENERAL CONDITIONS

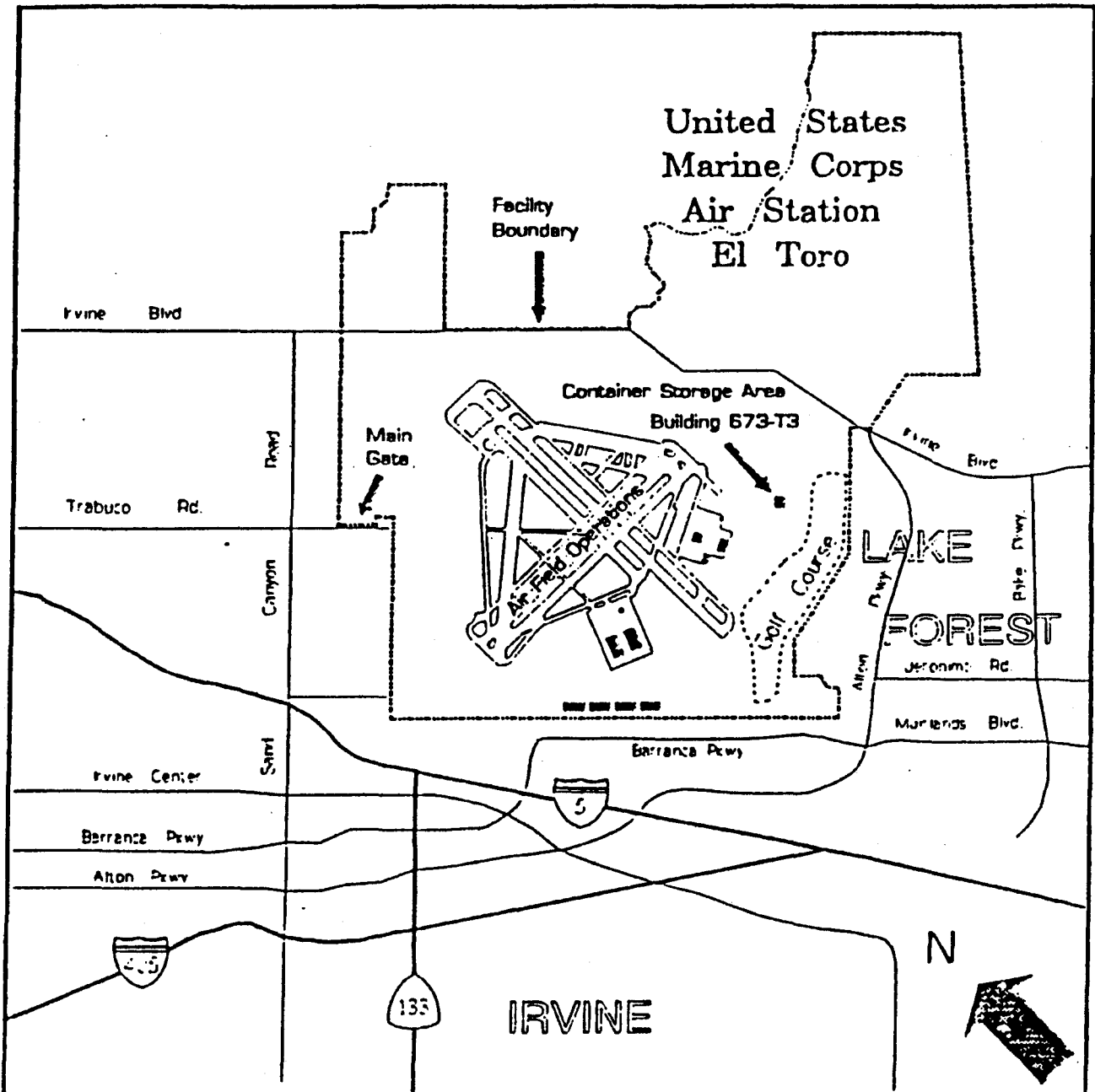
II.A. Effect of Permit

- II.A.1. The issuance of this permit by the Department does not release the owner or operator from any liability or duty imposed by federal or state statutes and regulations or local ordinances, except the obligation to obtain this permit. In particular, unless otherwise specifically provided in this permit, the owner or operator shall comply with the provisions of the Code of Federal Regulations (CFR), Title 40, Chapter I, Subchapter I, the California Health and Safety Code (H&SC), Division 20, Chapter 6.5 and the California Code of Regulations (C.C.R.), Title 22, Division 4.5.
- II.A.2. Issuance of this permit by the Department does not prevent the Department from adopting or amending regulations, issuing administrative orders, or obtaining judicial orders which impose requirements which are in addition to or more stringent than those in existence at the time this permit was issued, and does not prevent the enforcement of these requirements against the owner and/or operator of the facility. The owner or operator shall comply with any such additional or more stringent requirements in addition to the requirements and conditions specified in the permit. Where appropriate, this permit is also subject to H&SC Sections 25159.5 and 25159.6 relating to the incorporation of Federal regulations in the absence of equivalent State regulations.
- II.A.3. This permit does not convey any property rights of any sort, or any exclusive privileges.

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

Figure 1

CONTAINER STORAGE AREA MAP



United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

II.B. Consent to Entry by Department Representatives

The owner and/or operator, by accepting this permit, consent to entry by any authorized representative of the Department or of the local health officer at any reasonable hour of the day in order to carry out the purposes of the Hazardous Waste Control Law, Health and Safety Code, Section 25100 et seq., including but not limited to the activities listed in C.C.R., Title 22, Section 66270.30(i).

II.C Specific Conditions

II.C.1. The owner and/or operator shall comply with the general facility standards contained in C.C.R., Title 22, Division 4.5, Chapter 14, Article 2.

II.C.2. The owner and/or operator shall comply with preparedness and prevention requirements contained in C.C.R., Title 22, Division 4.5, Chapter 14, Article 3.

II.C.3. The owner and/or operator shall comply with the contingency plan and emergency procedure requirements contained in C.C.R., Title 22, Division 4.5, Chapter 14, Article 4.

II.C.4. The owner and/or operator shall comply with the manifest system, recordkeeping and reporting requirements contained in C.C.R., Title 22, Division 4.5, Article 5 of Chapter 14 and Section 66270.30(j)(2), and 66270.30(1) (7), (8) & (9).

II.C.4.a. Waste Analysis Plan, as required by 22 C.C.R., Title 22, Section 66264.13 and this Permit

II.C.4.b. Inspection schedules, as required by C.C.R., Title 22, Section 66264.15(b)(2) and this Permit

II.C.4.c. Personnel training documents and records, as required by C.C.R., Title 22, Section 66264.16(d) and this Permit

II.C.4.d. Contingency Plan, as required by C.C.R., Title 22, Section 66264.53(a) and this Permit

II.C.4.e. Operating records, as required by C.C.R., Title 22, Section 66264.73 and this Permit

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

II.C.4.f. Closure Plan, as required by C.C.R., Title 22, Section 66264.112(a) and this Permit

II.C.4.g. Waste minimization certification, as required by C.C.R., Title 22, Section 66264.73(b)(9) and this Permit

II.C.4.h. Internal tracking of hazardous waste inventory, as required by C.C.R., Title 22, Section 66264.73(b)(1) & (2) and this Permit

II.C.5. The owner and/or operator shall comply, if applicable, with the closure and post-closure requirements contained in C.C.R., Title 22, Division 4.5, Chapter 14, Article 7.

II.D. Land Disposal Restrictions

The owner and/or operator shall comply with applicable provisions of the land disposal restrictions/regulations as found in C.C.R., Title 22, Division 4.5, Chapter 18.

The owner and/or operator shall retain on-site until closure of the facility, a copy of all notices, certifications, demonstrations, waste analyses data, and other documentation related to the management of all wastes (for off-site treatment, storage or disposal) subject to land disposal restrictions.

The owner and/or operator shall retain on-site, a current waste analysis plan describing how and when wastes will be tested to comply with the land disposal restriction regulations.

II.E. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the owner and/or operator for a permit modification, revocation and reissuance, or termination or a notification of anticipated noncompliance or planned changes (except as provided in C.C.R., Title 22, Section 66270.42(a)), does not stay any permit condition. Except as provided in C.C.R., Title 22, Section 66270.42(a), a new facility permit condition or a modification of an existing facility permit condition shall become effective on the date specified in the Department's written notice of approval of the permit modification, pursuant to C.C.R., Title 22, Sections 66270.42 and/or 66271.14.

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

II.F. Need to Halt or Reduce Activity

It shall not be a defense for the owner and/or operator in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.

II.G. Severability

The provisions of this Permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

II.H. Permit Expiration

The life of the permit is ten (10) years. However, in accordance with C.C.R., Title 22, Section 66270.51, this permit and all conditions therein will remain in effect beyond the permit expiration or termination date, until the effective date of a new permit, if the owner or operator has submitted a timely and complete application (both Part A and Part B) for a new permit and, through no fault of the owner or operator, the Department has not issued a new permit. In accordance with C.C.R., Title 22, Section 66270.10(h), a timely and complete application for a new permit shall be submitted at least 180 days before this permit expires, unless permission for a later date is granted in writing by the Department.

II.I. 24-Hour Reporting

The owner and/or operator shall report to the Department any incidents of noncompliance, with the conditions of this permit and any of the provisions of C.C.R., Title 22, Division 4.5 or H&SC, Division 20, Chapter 6.5, which may endanger health or the environment, pursuant to the reporting requirements in C.C.R., Title 22, Section 66270.30(1)(6).

II.J. Notice of Planned Physical Changes and Certification of Construction

The owner and/or operator shall give notice to the Department as soon as possible, and at least 30 days in advance of, any planned physical alterations or additions to the permitted facility. In addition, prior to commencement of the treatment, storage, or transfer of hazardous wastes at a new facility or modified portion of an existing facility, the



United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

owner and/or operator shall comply with the requirements contained in C.C.R., Title 22, Section 66270.30(1)(2) and the compliance schedule specified in Permit Condition IV.

II.K. Operation at Night

When the facility is operated during hours of darkness, the owner and/or operator shall provide sufficient lighting to ensure safe, effective management of hazardous wastes.

II.L. Part B Application (Operation Plan) of the Hazardous Waste Facility Permit Application

II.L.1. By the issuance of this permit, the Part B Permit Application dated June 10, 1992 and subsequently revised June 29, 1992, hereinafter called Part B, is hereby approved. This Part B and any subsequent revisions thereto, subject to the permit modification requirements contained in C.C.R., Title 22, Sections 66270.41 and 66270.42, are by this reference made part of this permit. Specific sections of this Part B Permit Application are referenced elsewhere in this permit.

II.L.2. The owner and/or operator shall operate and maintain the facility in accordance with the Part B.

II.L.3. In the event of any conflict between this permit and the Part B referenced herein, the more stringent provisions shall be controlling.

II.L.4. The Part B and this permit shall be maintained at the facility and place of business at all times until closure is completed.

II.M. General Responsibilities of Operator

II.M.1. Compliance

The owner and/or operator shall comply with all conditions of this permit in accordance with C.C.R., Title 22, Section 66270.30(a). The owner or operator shall comply with all applicable laws, regulations, permits, zoning conditions, and all other requirements established by federal, state, and local agencies.

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

II.M.2. Transfer of the Permit

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to C.C.R., Title 22, Section 66270.40. The current owner and/or operator shall notify the Facility Permitting Branch Chief, Region 4 in writing, of a proposed change in ownership of this facility no later than 90 days prior to the proposed date of transfer. A copy of the notification, required under C.C.R., Title 22, Section 66264.12(c), informing the new owner or operator of the requirements of this permit and C.C.R., Title 22, Division 4.5, Chapters 14 and 20, shall be submitted to the Department.

II.M.3. Operation and Maintenance

II.M.3.a. The facility shall be maintained and operated at all times so as to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

II.M.3.b. All equipment, pipes, and lines used at the facility to handle, transfer, pump, or store hazardous wastes shall be maintained in a manner that prevents the leaking and spilling of hazardous wastes.

II.M.4. Submittal of Requested Information

The owner and/or operator shall furnish to the Department, within the time specified by the Department in its request, any relevant information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish to the Department, upon request, copies of records required to be kept by this permit.

II.M.5. Hazardous Waste List

The owner and/or operator shall maintain a current list of hazardous wastes that are handled by the facility. The owner and/or operator shall, as necessary, update the hazardous waste list presented in the approved Part B, in accordance with the permit modification requirements contained in C.C.R., Title 22, Section 66270.42 (a), (b) or (c). Any additions to the list must be approved by

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

the Department, in accordance with the requirements of C.C.R., Title 22, Sections 66270.41 and/or 66270.42, prior to their inclusion.

II.M.6. Anticipated Noncompliance

The owner and/or operator shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements, in accordance with C.C.R., Title 22, Section 66270.30(1)(2).

II.M.7. Noncompliance

In the event of noncompliance with the permit, the owner and/or operator shall take all reasonable steps to minimize or correct releases to the environment, and shall carry out all measures as are reasonable to prevent and correct adverse impacts on human health or the environment. The owner or operator shall report to the California Office of Emergency Services (800) 852-7550 any circumstances that may endanger public health or the environment immediately upon becoming aware of the incident.

II.M.8. Incomplete and/or Incorrect Information

Where the owner and/or operator becomes aware that any relevant facts were not submitted in a permit application, or incorrect information was submitted in a permit application or in any report to the Department, the owner and/or operator shall promptly submit such facts or information.

II.N. Signatory Requirement

II.N.1. The owner and/or operator shall comply with the signatory requirements in C.C.R., Title 22, Section 66270.11, for all applications, reports or information submitted to the Department.

II.N.2. The owner and/or operator shall provide documentation of an agreement for operation of the facility between the property owner and the facility owner, if different from the property owner.

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

II.O.      Waste Minimization Certification

The owner and/or operator shall certify annually, by March 1 for the previous year ending December 31, that:

II.O.1.    The facility has a program in place to reduce the volume and toxicity of all hazardous wastes in Part I Section L of the Part B which are generated by the facility operations to the degree, determined by the owner and/or operator, that is economically practicable.

II.O.2.    The method of transfer, storage, treatment, or disposal is the most practicable method currently available to the facility which minimizes the present and future threat to human health and the environment.

The owner and/or operator shall make this certification, in accordance with C.C.R., Title 22, Section 66270.11. The owner and/or operator shall submit the certification to the appropriate Department Regional Administrator and shall record and maintain on-site such certification in the facility Operating Record.

II.P.      Waste Minimization Conditions

II.P.1.    The owner and/or operator shall comply with the Hazardous Waste Source Reduction and Management Review Act requirements that are specified in the H&SC, Sections 25244.19, 25244.20 and 25244.21, and any subsequent applicable promulgations.

II.P.2.    The owner and/or operator shall submit a copy of all reviews, plans, plan summaries, reports and report summaries required by Section II.P.1 above, to the Department Regional Administrator, Region 4 within one year after the effective date of the permit and every four years thereafter. The appropriate Department Regional Administrator may require the facility to submit a more detailed status report explaining any deviation from, or changes to, the approved waste minimization plan.

II.Q.      Option to Cease Operation

If the owner and/or operator decides to cease conducting regulated activities rather than continue to operate and meet permit requirements, the owner and/or operator shall comply with the applicable requirements of C.C.R., Title 22, Section 66270.33(b).

PART III - SPECIAL CONDITIONS

III.A. Prohibition of Disposal

Pursuant to H&SC Section 25203, hazardous wastes shall not be disposed of at the facility unless such disposal is properly authorized by the Department under a permit or grant of interim status.

III.B. General Description of the Hazardous Waste Storage Facility and Permitted Hazardous Wastes

The facility is permitted to store hazardous wastes listed in Table 1 for longer than 90 days so long as these wastes are exclusively stored in the permitted hazardous waste storage area designated as Building 673-T3. The facility may not store in excess of 90 days the wastes listed in Table 1 in any area of the facility other than Building 673-T3.

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

Table 1  
Permitted Hazardous Wastes

U.S. EPA Hazardous Waste Number	California Hazardous Waste Number	Hazardous Wastes
D001	135, 151, 181, 211, 212, 213, 214, 221, 223, 281, 331, 343, 352, 461, 523, 541, 551, 611, 741	Ignitable Wastes: Absorbent, alodine, isopropanol, JP-5, JP-5 mixed with JP-4, labpack, naphtha, paint methanol, calcium hypochlorite, neoprene latex, butanol, glycol ether, turpentine, paint thinner, PD-680, solvents and waste oil
D002	135, 151, 181, 211, 212, 213, 214, 221, 223, 281, 331, 343, 352, 461, 523, 541, 551, 611, 741	Corrosive Wastes: Sulfuric acid, inorganic alkali, sodium disulphate, phosphoric acid, hydrochloric acid, sodium bicarbonate, potassium hydroxide, calcium oxide, sodium hydroxide, alodine, battery, detergent, labpack, paint thinner, solvents and zinc chloride
D003	181	Reactive Wastes: Lithium batteries
D006	171, 172, 361, 491	Cadmium Wastes: Washrack sludge, paint sludge and sand with paint chips
D007	172, 181, 352, 461	Chromium Wastes: Potassium dichromate, washrack sludge, zinc chromate, sand blasting grit and alodine containing chromium
D008	171, 172, 181, 352, 461	Lead Wastes: Blasting booth beads, waste paint slurry, alkaline cleaning compounds, contaminated rags, washrack sludge and oil contaminated with lead

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

Table 1 (cont)  
Permitted Hazardous Wastes

U.S. EPA Hazardous Waste Number	California Hazardous Waste Number	Hazardous Wastes
D009	181, 725	Mercury Wastes: Mercury batteries and mercury metallic waste
F001	741	Halogenated Solvent Wastes: Waste freon, waste TCA, spent halogenated solvents and trichlorotrifluoroethane
F002	211, 343, 741	Halogenated Solvent Wastes: Absorbents, spent halogenated solvents, labpack, dichlorodifluoroethane and methylene chloride in paint thinner
F003	214, 343, 461	Non-halogenated Solvent Wastes: Paint thinner, xylene, methanol, methyl ethyl ketone, methyl benzene, acetone, toluene, aliphatic isocyanate coating sludge and stripper
F004	214	Non-halogenated Solvent Wastes: Cresol, orthocresol in cleaner and degreaser
F005	461	Non-halogenated Solvent Wastes: Methyl ethyl ketone, toluene, paint waste and polyurethane coating

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

III.B.1. Hazardous Waste Storage Unit

The waste listed in Table 1 above may be stored longer than 90 days, so long as these waste are stored inside the hazardous waste storage facility, Building 673-T3. The maximum storage capacity for Building 673-T3 must not exceed 20,350 gallons (370 55-gallon drums) of any waste or combination of wastes listed in Table 1. Furthermore, the facility is not permitted to transfer and/or consolidate hazardous waste in Building 673-T3. All containers must be arranged in rows with a minimum of three (3) feet of aisle space between each adjacent row. Furthermore, the containers must follow the arrangement shown in Figure IV.2 of the approved Part B. Stacking of 55-gallon drums is not permitted; however, 6-gallon, 16-gallon, or 30-gallon drums may be stacked to a maximum height of four (4) feet for each of the three sizes. The container storage area must be constructed with a secondary containment system as provides in C.C.R., Title 22, Section 66264.175. In the permitted storage area the facility is not authorized to use any bulk stationary tank to store hazardous waste.

III.C. Permitted and Prohibited Waste Identification

III.C.1. Permitted Wastes

III.C.1.a. Storage in Containers

This permit authorizes the owner and/or operator to store wastes in containers as detailed in Table No. 2 at the facility, subject to the conditions of this permit, the requirements of C.C.R., Title 22, Division 4.5, Chapter 14, Article 9. For each identified waste, the maximum volume of each waste stream, and maximum number of drums are specified in Table No. 2.



United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

Table 2  
Hazardous Waste Storage Facility (Building 673-T3)  
Hazardous Waste Layout

Bay Number	Hazardous Waste Description	EPA, (CA) Hazardous Waste Number	Maximum Volume (Gallons)	Maximum Number of 55-gallon Containers
1	Ignitable Waste Non-halogenated Solvent Waste	D001 F003, F005	Any combination up to 4,510	82*
2	Ignitable Waste Non-halogenated Solvent Waste	D001 F003, F005	Any combination up to 7,920	144*
3	Acidic Corrosive Waste	D002	Any combination up to 6,600 or 960 lead acid batteries	120*
4	Reactive Waste	D003	324 spent lithium batteries	20*
5	Cadmium Waste Chromium Waste Lead Waste Mercury Waste Halogenated Solvent Waste Non-halogenated Solvent Waste Basic Corrosive Waste Waste Oil	D006 D007 D008 D009 F001, F002 F004 D002 (221)	Any combination up to 660	12*

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

Table 2 (cont.)  
Hazardous Waste Storage Facility (Building 673-T3)  
Hazardous Waste Layout

Bay Number	Hazardous Waste Description	EPA, (CA) Hazardous Waste Number	Maximum Volume (Gallons)	Maximum Number of 55-gallon Containers
5	Polychlorinated Biphenyls (PCBs) and oil containing PCBs	(261)	660	12*  or in original transformers

Table 3  
Maximum Hazardous Waste Inventory  
Hazardous Waste Storage Facility (Building 673-T3)

Bay #	Maximum Allowable Inventory		Secondary Containment Capacity
	Number of 55 Gallon Drums*	Maximum Capacity (Gallons)	
1	82	4,510	462 gallons
2	144	7,920	292 gallons
3	120	6,600 gallons or 960 lead acid batteries	660 gallons
4	0	324 Lithium Batteries	
5	24	1,320	232 gallons

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

III.D. Additional Specific Conditions

- III.D.1. \* For Table 2 facility may use any combinations of Department of Transportation (DOT) approved drums not to exceed 55 gallons for storage or 85 gallons for over-packing. Also, the arrangement of pallets must follow Figure IV.2 of the approved Part B.
- III.D.2. The facility may use 85-gallon DOT-approved drums for overpacking only.
- III.D.3. The facility may not store any hazardous waste, at Building 673-T3, for more than one year (365 days) from the date of accumulation.
- III.D.4. The facility must store drums on 4' X 4' pallets. The facility may store up to four 55-gallon drums or 32 lead acid batteries on each pallet following the layout sketch shown on Page IV.14 of the approved Part B. Loose batteries are permitted to be stacked two (2) layer high. Each battery layer shall be shrink-wrapped together in plastic prior to stacking.
- III.D.5. The facility may store used lithium batteries in wooden containers but only on pallets in Bay #4. Lithium batteries Must be doubled-wrapped in plastic prior to storage. The pallet configuration and number shown on Page IV.14, Figure IV.3 of the approved Part B must be followed. Lithium batteries may be stacked to a maximum height of 4 feet measured from the top of the pallet.
- III.D.6. Permitted storage of corrosive acids is limited to Bay #3 only, while permitted storage of corrosive bases is exclusively limited to Bay #5.
- III.D.7. Except for the waste described in Section II.B.6 (above) all other waste must be placed and separated as shown in the layout sketch on Page IV.14, Figure IV.3 of the approved Part B.
- III.D.8. The facility is not authorized to treat any hazardous waste.
- III.D.9. The container capacity will be used to calculate maximum volume of hazardous waste per bay.

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

III.E. Prohibited Wastes

Except as otherwise provided by H&SC, Division 20, Chapter 6.5 and C.C.R., Title 22, Division 4.5, the following limitations apply to hazardous waste not described in this permit:

- III.E.1. Any hazardous waste not listed in the Section III.C. (above) may not be stored for any period of time in the hazardous waste storage area located in Building 673-T3.
- III.E.2. The facility may not handle any off-site hazardous waste.

Part IV - COMPLIANCE SCHEDULE

IV.A. Reporting

The owner and/or operator shall comply with the compliance schedule requirements of C.C.R., Title 22, Section 66270.30(1)(5).

IV.B. Summary of Compliance Schedule

The following compliance time schedule items shall be met:

- IV.B.1. Submit a seismic reinforcement design study for Building 673-T3 to the Department. The report shall indicate all required construction to retrofit Building 673-T3 in accordance with the California Uniform Building Code (UBC) and be able to withstand a maximum credible earthquake.

Due Date: Within ninety (90) days of the effective date of this permit.

- IV.B.2. Complete reinforcement of Building 673-T3 to strengthen its structural frame to meet the California UBC and withstand a maximum credible earthquake.

Due Date: Within one year of the effective date of this permit.

- IV.B.3. Submit to the Department a certification, signed by an independent professional civil engineer registered in California, indicating that Building 673-T3 has been retrofitted in

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

accordance with the California UBC and as per the approved seismic reinforcement design study report.

Due Date: Within ninety (90) days of completion of reinforcement.

Part V - CORRECTIVE ACTION

V.A. Permit Provisions

V.A.1. United States Environmental Protection Agency, and Department of Toxic Substances Control have signed a Federal Facility Agreement (Agreement) with Marine Corps Air Station El Toro for remediation of releases and corrective action at the facility. The activities required by the Agreement are intended to satisfy the corrective action requirements of RCRA section 3004(u) and (v), 42 U.S.C. § 6924(u) and (v). The Agreement and any schedules contained therein are hereby incorporated by reference as the schedule for completing corrective action at the facility, as required by RCRA section 3004(u) and (v), 42 U.S.C. § 6924(u) and (v). Inclusion of this provision in the permit is not intended to modify in any fashion any term, condition, or requirement of the Agreement. A copy of the Agreement is attached to this permit.

V.A.2. This permit does not modify any rights reserved by EPA or the Department in the Agreement, including without limitations, rights reserved with respect to any release which is not the subject of an RI/FS conducted pursuant to the Agreement or any release which is not adequately addressed by the remedial actions provided for under the Agreement. Prior to the termination of the Agreement, any response or corrective action with respect to any such release shall be governed by the terms of the Agreement, including provisions governing resolution of disputes under the Agreement. Nothing prevents the parties of the Agreement from agreeing to use the following conditions prior to termination of the Agreement if appropriate in the circumstances of any such release. Following termination of the Agreement, Section V.B. through Section V.F. of the Permit applies to any such release.

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

V.B. Corrective Action Permit Requirements

V.B.1. Standard Conditions

V.B.1.a. Section 3004(u) of RCRA, as mentioned by the Hazardous and Solid Waste Amendments of 1984, C.F.R., Title 40, Section 264.101, C.C.R., Title 22, Section 66264.100 and C.C.R., Title 22, Section 66264.800 requires that permits address corrective action for releases of hazardous waste including hazardous constituents from any Solid Waste Management Unit (SWMU) at a facility, regardless of when the waste was placed in the unit.

V.B.1.b. Failure to submit the information required in this Section of the Permit, or falsification of any submitted information, is grounds for termination of this Permit (C.F.R., Title 40, Section 270.43, C.C.R., Title 22, Section 66264.43). The Permittee shall ensure that all plans, reports, notifications and other submissions to the Department required in this Section of the Permit are signed and certified in accordance with C.F.R., Title 40, Section 270.11 and C.C.R., Title 22, Section 66264.11. Three (3) copies of these plans, reports, notifications or other submissions shall be submitted to the Department and sent by certified mail, return receipt requested or by hand delivery to:

Site Mitigation Branch Chief  
Department of Toxic Substance Control  
Region 4  
245 West Broadway, Suite 350  
Long Beach, California 90802

The Site Mitigation Branch Chief (Branch Chief) may designate any member of the Site Mitigation Branch Region 4 to receive any plans, reports, notifications, or other submissions. The Branch Chief may delegate any authority under this Permit to any manager of the Site Mitigation Branch Region 4. The Department will inform the Permittee in writing of any such designation and/or delegation.

V.B.1.c. All plans and schedules required by this Section of the Permit are, upon approval of the Branch Chief, incorporated into this Permit by reference and become an enforceable part of this Permit.

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

Any noncompliance with such approved plans and schedules shall be termed noncompliance with this Permit. Extensions of the due dates for submittals may be granted by the Branch Chief in accordance with the permit modification processes under C.F.R., Title 40, Section 270, Subpart D and C.C.R., Title 22, Division 4.5, Chapter 20, Article 4.

V.B.1.d. If the Branch Chief determines that further actions beyond those provided in this Corrective Action Schedule of Compliance, or changes to that which is stated herein, are warranted, the Branch Chief shall modify the Section (Section V) of the permit according to the procedures in Section V.C.2. of this Permit or according to the permit modification procedures under C.F.R., Title 40, Section 264.41 and C.C.R., Title 22, Section 66264.41.

V.B.1.e All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken pursuant to this Corrective Action Schedule of Compliance shall be maintained at the facility during the term of this Permit, including any reissued Permits.

V.C. Modifications of Corrective Action for Solid Waste Management Units

V.C.1. Any modification of this Section of the Permit shall be performed according to the procedures of C.F.R., Title 40, Section 270, Subpart D and C.C.R., Title 22, Division 4.5, Chapter 20, Article 4.

V.C.2. Modifications that are initiated and finalized by the Branch Chief according to this procedure shall not subject to administrative appeal.

V.C.3. Modifications to this Section do not constitute a reissuance of the Permit.

V.D. Notification Requirements for and Assessment of Newly Identified Solid Waste Management Units

V.D.1. The Permittee shall notify the Branch Chief in

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

writing of any newly-identified SWMU(s) (i.e., a unit not specifically identified during the RFA and listed in Permit Condition V.A.1), discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than thirty (30) days after discovery.

V.D.2. After such notification, the Branch Chief may request, in writing, that the Permittee prepare a Solid Waste Management Unit (SWMU) Assessment Plan and a proposed schedule of implementation and completion of the plan for any additional SWMU(s) discovered subsequent to the issuance of this Permit.

V.D.3. Within ninety (90) days after receipt of the Branch Chief's request for a SWMU Assessment Plan, Permittee shall prepare a SWMU Assessment Plan for determining past and present operations at the unit, as well as any sampling and analysis of ground water, land surface and subsurface strata, surface water or air, as necessary to determine whether a release of hazardous waste including hazardous constituents from such unit(s) has occurred, is likely to have occurred, or is likely to occur. The SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste including hazardous constituents from the newly discovered SWMU(s) to the environment.

V.D.4. After the Permittee submits the SWMU Assessment Plan, the Branch Chief shall either approve or disapprove the Plan in writing.

If the Branch Chief approves the Plan, the Permittee shall begin to implement the Plan within thirty (30) days of receiving such written notification.

If the Branch Chief disapproves the Plan, the Branch Chief shall either (1) notify the Permittee in writing of the Plan's deficiencies and specify a due date for submittal of a revised Plan, or (2)



United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

revise the Plan and notify the Permittee of the revisions. This Branch Chief-revised Plan becomes the approved SWMU Assessment Plan. The Permittee shall implement the Plan within thirty (30) days of receiving written approval.

- V.D.5. The Permittee shall submit a SWMU Assessment Report to the Branch Chief no later than thirty (30) days from completion of the work specified in the approved SWMU Assessment Plan. The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan. At a minimum, the Report shall provide the following information for each newly identified SWMU:
- V.D.5.a. The location of the newly-identified SWMU in relation to other SWMUs ;
  - V.D.5.b. The type and function of the unit;
  - V.D.5.c. The general dimensions, capacities, and structural description of the unit (supply any available drawings);
  - V.D.5.d. The period during which the unit was operated;
  - V.D.5.e. The specifics on all wastes that have been or are being managed at the SWMU, to the extent available; and
  - V.D.5.f. The results of any sampling and analysis required for the purpose of determining whether releases of hazardous wastes including hazardous constituents have occurred, are occurring, or are likely to occur from the unit.
- V.D.6. Based on the results of this Report, the Branch Chief shall determine the need for further investigations at specific unit(s) covered in the SWMU Assessment. If the Branch Chief determines that such investigations are needed, the Branch Chief may require the Permittee to prepare a plan for such investigations. This plan will be reviewed for approval as part of the RFI Workplan under Permit Condition V.D.3.

United States Marine Corps  
Air Station El Toro  
Hazardous Waste Facility Permit

V.E. Notification requirements for Newly-Discovered Releases at Solid Waste Management Units

The Permittee shall notify the Branch Chief, in writing, of any new release(s) of hazardous waste including hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other activities undertaken after commencement of the RFI required by the Order, no later than fifteen (15) calendar days after discovery. Such newly-discovered releases may be from newly identified units, from units for which, based on the findings of the RFA, the Branch Chief had previously determined that no further investigation was necessary. The Branch Chief may require further investigation of the newly-identified release(s).

V.F. Public Notification of Final RFI Report Availability

The Permittee shall mail the Department approved Final RFI Report to all individuals on the facility mailing list established pursuant to C.F.R., Title 40, Section 124.10(c)(1) and C.C.R., Title 22, Section 66264.171.9(c)(1) within fifteen (15) calendar days of the receipt of approval.

**Attachment 8**  
**Notice of Proposed RCRA Corrective Action**  
**Complete Determination**



**Notice  
of  
Proposed Corrective Action Complete  
Determination  
Former Marine Corps Air Station El Toro  
Orange County, California**



The California Department of Toxic Substances Control (DTSC) is providing this notice to the community to review and comment on a proposed Resource Conservation and Recovery Act (RCRA) Corrective Action Complete Determination at the Former Marine Corps Air Station (MCAS) El Toro. This notice provides information regarding the purpose of the determination, the property subject of this determination, and opportunity for public comment.

### **Introduction**

MCAS El Toro was commissioned in 1943 as a Marine Corps pilot fleet operation training facility and was expanded into a master jet station and Marine Corps aviation center. The facility included runways, aircraft maintenance, training facilities, housing, and other support facilities. MCAS El Toro was operationally closed in July 1999. The majority of the facilities are now vacant and the primary activities at the station are caretaker-related activities and environmental investigation and cleanup of contaminated properties.

### **What is RCRA Corrective Action?**

Corrective action is required of a hazardous waste facility to clean up contamination that resulted from past practices on their entire property. A hazardous waste facility is any facility that treats, stores, or disposes hazardous waste in accordance with authorization issued under RCRA. MCAS El Toro had a RCRA permit that expired in August 2003. Permitted facilities are required to clean up contaminated soil, surface water, and groundwater to protect human health and the environment under a process known as corrective action.

A RCRA Corrective Action Complete Determination officially recognizes that all hazardous waste contamination has been cleaned up. It allows the Navy to transfer clean parcels at Former MCAS El Toro to new owners without transfer of the liability for corrective action.

At MCAS El Toro, DTSC proposes to make this determination based on the completion of the investigation and cleanup of

### **Public Comment Period**

**May 3, 2004  
to  
June 17, 2004**

The Department of Toxic Substances Control (DTSC) invites you to review and comment on the proposed Corrective Action Complete Determination for Parcel IV and Portions of Parcels I, II, and III at the Former MCAS El Toro, as described in the Navy's Finding of Suitability to Transfer (FOST). As the proposed determination will not create a significant effect upon the environment, DTSC has proposed a California Environmental Quality Act (CEQA) Notice of Exemption, which will also be available for review.

**All written comments must be postmarked no later than June 17, 2004, and should be mailed or e-mailed to:**

Tayseer Mahmoud  
Project Manager  
DTSC  
5796 Corporate Avenue  
Cypress, CA 90630

(714) 484-5419  
[tmahmoud@dtsc.ca.gov](mailto:tmahmoud@dtsc.ca.gov)

hazardous waste areas conducted under several programs. These programs are the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), overseen by DTSC, the Regional Water Quality Control Board (RWQCB) and the United States Environmental Protection Agency (U.S. EPA), and the underground/aboveground storage tank cleanup programs overseen by the RWQCB and the Orange County Health Care Agency (OCHCA). Where the Orange County Health Care Agency or the Santa Ana Regional Water Quality Control Board has provided regulatory closure letters, DTSC has not conducted independent evaluations of these actions and is basing its determination on the respective agency findings.

Not all of MCAS El Toro has been cleaned up. The Navy is retaining ownership of 994.7 acres that are not currently suitable for transfer due to ongoing investigation and cleanup work. RCRA Closure and Corrective Action requirements continue to apply to the retained property. A map showing the original and revised MCAS El Toro hazardous waste facility boundaries is attached.

## The Land Proposed for Transfer

The Navy's Finding of Suitability to Transfer (FOST) documents the environmental suitability of federally owned property at MCAS El Toro for transfer to non-federal ownership consistent with CERCLA and Department of Defense policy. The FOST identifies notifications and restrictions necessary to protect human health and the environment that apply to the property being transferred.

*The Draft Final FOST (Parcel IV and Portions of Parcels I, II, and III), Former Marine Corps Air Station El Toro, California, May 2004,* summarizes the Navy's environmental investigation and cleanup activities conducted for each of the parcels proposed for transfer.

The FOST provides the necessary disclosure, notifications, and use restrictions that apply to each parcel. The use restrictions will be included in the deed for each parcel. The transferring parcels in the FOST comprise 2798 acres of the former MCAS El Toro. Each parcel was evaluated for hazardous substance releases that may have occurred based on the types of historic activities. These areas are identified as Locations of Concern. The locations include sites where waste was handled, known spill or disposal sites, storage tanks, waste-water treatment system sites, PCB transformers, and other miscellaneous sites. The FOST concludes that corrective action has been completed for all Locations of Concern within the transferring parcels.

Parcel	Acreage	Number of Facilities	Locations of Concern
I	809.5	225	218
II	1439.6	1078	201
III	329	10	17
IV	219.4	0	0

For more information about the parcels, please see the FOST in its entirety.

This DTSC determination shall have no effect upon the MCAS El Toro National Priorities List site designation.

## California Environmental Quality Act Notice of Exemption

A draft Notice of Exemption (NOE) has been prepared for this project. DTSC has determined that the proposed RCRA Corrective Action Complete Determination for the FOST parcels and the changes to the Former MCAS El Toro boundaries will not have a significant impact on the environment. The draft NOE is available for review at the Information Repositories.



## LEGEND

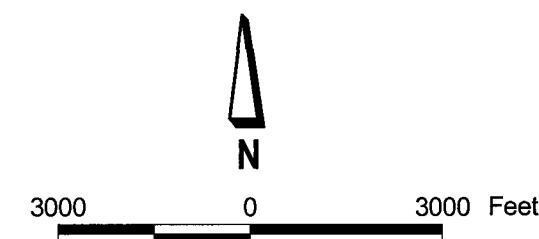
- Property Boundary
- Roads
- Revised Boundary
- Corrective Action Complete Determination Area

## SOURCE

Final Environmental Baseline Survey,  
Former Marine Corps Air Station  
El Toro, California. 2003

Draft Final Revision 2 Finding of Suitability  
to Transfer, Former MCAS El Toro. 2004

Draft Final Revision 2 Finding of Suitability  
to Lease, Former MCAS El Toro. 2004



**DTSC's Revised Facility Boundary  
Former MCAS El Toro  
California**

**Attachment 9**  
**Final RCRA Corrective Action**  
**Determination Package**



## Department of Toxic Substances Control



Terry Tamminen  
Agency Secretary  
Cal/EPA

700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721

Arnold Schwarzenegger  
Governor

July 23, 2004

Mr. F. Andrew Piszkin, P.E.  
BRAC Environmental Coordinator  
Marine Corps Air Station El Toro  
Base Realignment and Closure  
7040 Trabuco Road  
Irvine, California 92618

### **CORRECTIVE ACTION COMPLETE DETERMINATION AND BOUNDARY MODIFICATION FOR THE SALE PARCELS AT THE FORMER MARINE CORPS AIR STATION EL TORO, IRVINE, CALIFORNIA**

Dear Mr. Piszkin:

The Department of Toxic Substances Control (DTSC) has reviewed the Final Finding of Suitability to Transfer (Parcel IV and Portions of Parcels I, II, and III), former Marine Corps Air Station El Toro (MCAS El Toro), California, dated July 2004, and finds that Corrective Action, as required by California Health and Safety Code section 25200.10, has been completed for all hazardous constituent releases on the portions of MCAS El Toro proposed for sale and transfer by deed. The hazardous waste facility boundary of MCAS El Toro is hereby modified to exclude the property identified for transfer by deed.

MCAS El Toro is a Resource Conservation Recovery Act (RCRA) hazardous waste facility which operated under a Part B Storage Permit until it expired in 2003. As a hazardous waste facility, MCAS El Toro is required to conduct corrective action for all releases of hazardous constituents on all contiguous property owned or operated by MCAS El Toro. RCRA corrective action applies to a broad range of hazardous substance releases and is not limited to hazardous waste. All spills and releases of fuel, oil, and hazardous chemicals are subject to RCRA corrective action. Because of this, DTSC makes the determination that corrective action has been completed based on a DTSC file review, review of the MCAS El Toro Finding of Suitability to Transfer, and relying on findings, supporting documentation and correspondence from the Santa Ana Regional Water Quality Control Board and the Orange County Health Care Agency.

Identification of hazardous constituent releases was completed through a RCRA Facility Assessment; an historical aerial photograph survey; the aboveground and underground storage tank inventory and closure program; a polychlorinated bi-phenyls (PCBs)



Mr. F. Andrew Piszkin, P.E.

July 23, 2004

Page 2

transformer and equipment inventory, and through assessments conducted under the U.S. Navy's Installation Restoration Program (IRP). DTSC has determined that there are no RCRA-regulated hazardous waste treatment, storage or disposal units existing in the parcels proposed for deed transfer. In addition, the following locations of concern have been identified and addressed within the parcels proposed for deed transfer:

- 1) 113 hazardous substance and IRP locations of concern that received regulatory concurrence for No Further Action decisions,
- 2) 211 aboveground and underground storage tank sites that received regulatory closure letters, and
- 3) 106 other locations which were evaluated for presence of PCBs, or other miscellaneous hazardous materials.

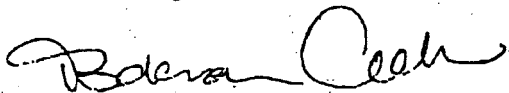
The MCAS El Toro Finding of Suitability to Transfer (FOST) documents environmental findings to support that the property proposed for transfer is suitable for transfer by deed. The FOST documents that corrective action has been conducted for all hazardous waste, hazardous substance and hazardous constituent releases identified by previous environmental assessments and that those actions were conducted to adequately protect human health, safety and the environment. The FOST further documents that the deed transfer property will not be negatively impacted by adjacent properties and contiguous carve-out Finding of Suitability to Lease properties where corrective action has not been completed.

This Corrective Action Complete determination is made based on the completeness of environmental assessments to identify releases and the accuracy of documentation provided DTSC in support of corrective action completion. Where the Orange County Health Care Agency or the Santa Ana Regional Water Quality Control Board has provided regulatory closure letters (see item 2 above), DTSC has not conducted independent evaluations of these actions and is basing its determination on the respective agency findings. DTSC reserves the right to require additional corrective action should new information arise.

Mr. F. Andrew Piszkin, P.E.  
July 23, 2004  
Page 3


If you have questions or comments concerning this matter, please contact DTSC's Office of Military Facilities Division Project Manager, Mr. Tayseer Mahmoud, at (714) 484-5419.

Sincerely,



Barbara Coler, Chief  
Permitting and Corrective Action Division  
Hazardous Waste Management Program

cc: Mr. Robert Woodings  
Restoration Advisory Board  
Co-chair  
23161 Lake Center Drive, Suite 100  
Lake Forest, California 92630

Ms. Marcia Rudolph  
Restoration Advisory Board  
Subcommittee Chair  


Mr. Walter F. Sandza, P.E.  
Naval Facilities Engineering  
Command  
Southwest Division Code - 03EN  
1220 Pacific Highway  
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Mr. Robert Kirkbright, P.E.  
Naval Facilities Engineering  
Command  
Southwest Division - 03EN  
1220 Pacific Highway  
San Diego, California 92132-5187

Ms. Laura Duchnak  
Naval Facilities Engineering Command  
Southwest Division  
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Ms. Kyle Olewnik  
Remedial Project Manager  
Naval Facilities Engineering Command  
Southwest Division - Code 06CC.KO  
1220 Pacific Highway  
San Diego, California 92132-5187

Ms. Kathleen Johnson, Chief  
Federal Facilities and Site Cleanup Branch  
U.S. Environmental Protection Agency  
Region IX  
Superfund Division (SFD-8)  
75 Hawthorne Street  
San Francisco, California 94105-3901

Ms. Arlene Kabei  
Division Director  
U.S. Environmental Protection Agency  
Region IX  
Waste Management Division (WST-1)  
75 Hawthorne Street  
San Francisco, California 94105-3901

Mr. F. Andrew Piszkin, P.E.

July 23, 2004

Page 4

cc: Ms. Nicole Moutoux  
Remedial Project Manager  
U.S. Environmental Protection  
Agency Region IX  
Superfund Division (SFD-8-1)  
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Ms. Polin Modanlou  
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Planning and Development Services  
Department  
300 North Flower Street, 3rd Floor  
Santa Ana, California 92703

Mr. Steven Sharp  
Orange County Health Care Agency  
2009 East Edinger Avenue  
Santa Ana, California 92705

Mr. Daniel Jung  
Director of Strategic Programs  
City of Irvine  
P.O. Box 19575  
Irvine, California 92623-9575

Mr. John Broderick  
Remedial Project Manager  
Regional Water Quality Control Board  
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3737 Main Street, Suite 500  
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Ms. Dorothy Rice  
Deputy Director  
Site Mitigation and Brownfields Reuse  
Program  
Department of Toxic Substances Control  
1001 I Street  
P. O. Box 806  
Sacramento, California 95812-0806

Mr. Rick Moss  
Division Chief  
Office of Military Facilities  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, California 95826

Mr. Tayseer Mahmoud  
Southern California Branch  
Office of Military Facilities  
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Cypress, California 90630

Mr. Watson Gin  
Deputy Director  
Hazardous Waste Management Program  
Department of Toxic Substances Control  
1001 I Street  
P.O. Box 806  
Sacramento, California 95812-0806



## Department of Toxic Substances Control



Terry Tamminen  
Agency Secretary  
Cal/EPA

5796 Corporate Avenue  
Cypress, California 90630

Arnold Schwarzenegger  
Governor

July 22, 2004

Mr. F. Andrew Piszkin, P.E.  
BRAC Environmental Coordinator  
Marine Corps Air Station El Toro  
Base Realignment and Closure  
7040 Trabuco Road  
Irvine, California 92618

### CONCURRENCE ON FINDING OF SUITABILITY TO TRANSFER (PARCEL IV AND PORTIONS OF PARCELS I, II, AND III), FORMER MARINE CORPS AIR STATION EL TORO

Dear Mr. Piszkin:

The Department of Toxic Substances Control (DTSC) has reviewed electronic versions of the revised text, tables, figures and attachments for the *Finding of Suitability to Transfer (Parcel IV and Portions of Parcels I, II, and III), Former Marine Corps Air Station, El Toro, California*, dated July 2004. Based upon review of the revised text, tables, figures and attachments, DTSC comments sent in a letter dated June 17, 2004 have been adequately addressed.

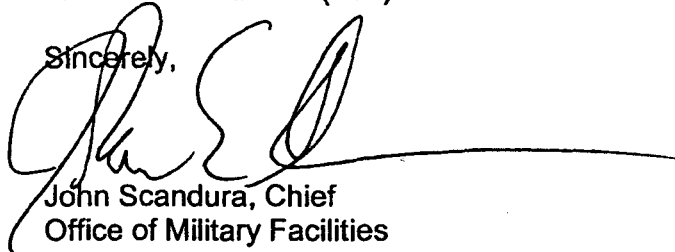
This document, referred to as the FOST, is intended to establish that the property identified above is suitable for transfer by deed. There are specified areas that are subject to ongoing environmental investigations or response actions that are not suitable for transfer by deed. These areas have been carved out of the parcels proposed for transfer and are included in the *Finding of Suitability to Lease for Carve-outs Within Parcels I, II, and III, Former Marine Corps Air Station, El Toro, California*, dated July 2004.

DTSC concurs that the property associated with this FOST can be transferred with the specified conditions, notifications and restrictions in a manner that is protective of human health and the environment.

Mr. F. Andrew Piszkin, P.E.  
July 22, 2004  
Page 2

Thank you for providing DTSC with the opportunity to review the FOST. If you have any questions regarding this letter, please contact Mr. Manny Alonzo at (714) 484-5425 or Ms. Jennifer Rich at (714) 484-5415.

Sincerely,



John Scandura, Chief  
Office of Military Facilities  
Southern California Operations Branch

cc: Mr. Robert Woodings  
Restoration Advisory Board Co-chair  
23161 Lake Center Drive, Suite 100  
Lake Forest, California 92630

Ms. Marcia Rudolph  
Restoration Advisory Board Subcommittee Chair

[Redacted]

Ms. Polin Modanlou  
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Planning and Development Services Department  
300 North Flower Street, 3<sup>rd</sup> Floor  
Santa Ana, California 92703

Mr. Steven Sharp  
Orange County Health Care Agency  
2009 East Edinger Avenue  
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Mr. Daniel Jung  
Director of Strategic Programs  
City of Irvine  
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Irvine, California 92623-9575

Mr. F. Andrew Piszkin, P.E.  
July 22, 2004  
Page 3

cc: Ms. Content Arnold  
Lead Remedial Project Manager  
Naval Facilities Engineering Command  
Southwest Division – Code 06CC.KO  
1220 Pacific Highway  
San Diego, California 92132-5187

Ms. Kyle Olewnik  
Remedial Project Manager  
Naval Facilities Engineering Command  
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San Diego, California 92132-5187

Ms. Nicole Moutoux  
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U. S. Environmental Protection Agency Region IX  
Superfund Division (SFD-8-1)  
75 Hawthorne Street  
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Mr. John Broderick  
Remedial Project Manager  
California Regional Water Quality Control Board  
Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, California 92501-3348



Terry Tamminen  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control

5796 Corporate Avenue  
Cypress, California 90630



Arnold Schwarzenegger  
Governor

### DEPARTMENT OF TOXIC SUBSTANCES CONTROL OFFICE OF MILITARY FACILITIES

#### RESPONSE TO COMMENTS FOR RCRA CORRECTIVE ACTION COMPLETE DETERMINATION & RCRA FACILITY BOUNDARY MODIFICATION

#### MARINE CORPS AIR STATION EL TORO JULY 2004

The California Department of Toxic Substances Control (DTSC) issued a public notice on a proposed Resource Conservation and Recovery Act (RCRA) Corrective Action Complete Determination and a RCRA Hazardous Waste Facility Boundary Modification at the former Marine Corps Air Station (MCAS) El Toro. DTSC also publicly noticed a proposed Notice of Exemption (NOE) prepared for the project under the California Environmental Quality Act (CEQA). The same notice invited comments on the Draft Final Finding of Suitability to Transfer (FOST) for certain properties at MCAS El Toro that was prepared by Department of the Navy (DON). DTSC mailed the public notice to approximately 600 individuals on the MCAS El Toro mailing list on April 30, 2004. A public notice was published in the Los Angeles Times and the Orange County Register on May 2, 2004. The 45-day public comment period started on May 3, 2004, and ended on June 17, 2004. DTSC considered all public comments related to the Determination and RCRA Facility Boundary Modification during the public comment period, concurred with the Final FOST, finalized a NOE, and made a decision to approve the Determination and RCRA Facility Boundary Modification. The DON received comments on the Draft Final FOST and has responded to those comments in Attachment 4 of the Final FOST.

The following are the DTSC's responses to comments received during the public comment period for the RCRA Corrective Action Complete Determination:

#### **Comment by Charles Griffin 6/17/2004:**

The Draft Final Finding of Suitability to Transfer (FOST) for certain property at the former Marine Corps Air Station (MCAS) El Toro and the proposed Resource Conservation Recovery Act (RCRA) Corrective Action Complete Determination and hazardous waste facility boundary modification are intuitively, obviously, absolutely, and

categorically inappropriate and incomplete because they have been prepared and published for the purpose of transferring contaminated property for use as private residences and public municipal park and recreation uses. The obvious appropriate use of this property is as an international airport operated by Los Angeles World Airports (LAWA) as illustrated on the website <http://www.ocxeltoro.com>. The Draft Final Finding of Suitability to Transfer (FOST) for certain property at the former Marine Corps Air Station (MCAS) El Toro and the proposed Resource Conservation Recovery Act (RCRA) Corrective Action Complete Determination and hazardous waste facility boundary modification would be appropriate for the Navy to sell the closed MCAS El Toro to LAWA who could purchase it with FAA Aid-to-airport grant funds in order to expand aviation operations to meet the ever expanding air-transportation market in Southern California.

An international airport at El Toro operated as proposed per <http://www.ocxeltoro.com> would remove ever growing pressure to use a portion of the Marine bases at Camp Pendleton and Miramar as a commercial airport, and would provide the FAA airport funds (instead of Navy funds) to mitigate the contamination at the MCAS El Toro and to filter underground water contaminated in the future by the existing migrating underground toxic plum at the airport (as normal airport operating expenses).

An international airport at El Toro would provide a base for military aircraft to protect against the growing inherent international terrorist threat against an aircraft suicide attack on the nuclear power plant at nearby San Onofre, and provide a base for aerial water-tankers to protect the contiguous natural wildlife preserve that stretches from the Riverside County line to the Pacific Ocean and provides wide natural uninhabited air corridors for arrival to and departure from an airport at El Toro into the prevailing on-shore wind and seasonal Santa Ana winds.

**DTSC Response:** Thank you for your comment. DTSC is responding to a portion the comments as it relates to RCRA Corrective Action Complete Determination. DTSC does not agree that the property is contaminated and not suitable for the intended reuses (private residences and public municipal park and recreation uses). The FOST documents that corrective action has been conducted for all hazardous waste, hazardous substance and hazardous constituent releases identified by previous environmental assessments and that those actions were conducted to adequately protect human health, safety, and the environment. Also, the FOST provides the necessary disclosure, notification, and use restrictions that apply to each parcel.

The California Health and Safety Code section 25187 authorizes DTSC to require corrective action for any release from a hazardous waste facility such as Marine Corps



Air Station El Toro. Identification of hazardous constituent releases was completed through a RCRA Facility Assessment; a historical aerial photograph survey; the aboveground and underground storage tank inventory and closure program; a polychlorinated bi-phenyls (PCBs) transformer and equipment inventory, and through assessments conducted under the U.S. Navy's Installation Restoration Program (IRP). DTSC made the determination based on the completion of the investigation and cleanup of hazardous waste areas conducted under several programs. These programs are the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) overseen by DTSC, the Regional Water Quality Control Board (RWQCB), and the United States Environmental Protection Agency (U.S. EPA); and underground/aboveground storage tank cleanup programs overseen by the RWQCB and the Orange County Health Care Agency (OCHCA). Environmental impacts associated with past and present activities at the subject property have been investigated and appropriate remedial action has taken place at the locations of concern where hazardous substance releases might have occurred. All of the above actions were conducted in order to adequately protect human health and the environment.

The remaining comments on the reuse of the El Toro property as an airport is noted and DTSC will not provide a response because the comments are not related to the RCRA Corrective Action Complete Determination.

**Comment by Greg Hurley, Greenberg Traurig, LLP May 6, 2004:**

It is my understanding that the Navy last week formally published the FOST. I expect that this happened after your 2 day BCT meeting on final comments on the FOST & FOSL.

Is it true that at the end of this comment period the FOST is considered final? Do the regulators accept the published FOST as being adequate? It is my understanding that there are still outstanding issues on what the FOST must contain. For example, DTSC's position on lead based paint sampling, and incorporating the data on Perchlorate into the FOST & EBS. How will these be disclosed after the approval of the FOST?

**DTSC Response:** The Draft Final Revision 2 Finding of Suitability to Transfer (FOST) was formally public noticed and available for public comment from May 3, 2004 through June 17, 2004. Regulatory agencies and DON held a two-day meeting on April 21 - 22, 2004 and discussed comments on the Draft Final FOST that would be released on May 3, 2004. During the 45-day public comment period, DTSC and DON did not receive a request for a public meeting or an extension request beyond the comment period. Therefore, the public comment period is considered closed.

The Navy has responded to all comments submitted by the regulatory agencies and the public and the responses are included in Attachment 4 of the July 2004 Final FOST, Comments/Responses to Comments. Issues that have not been resolved, if any, can be found in Attachment 5, Unresolved Comments. After review of the Final FOST and consideration of public comments on the document, DTSC concurred on the Final FOST on July 22, 2004.

Regarding lead-based paint (LBP), DTSC and the DON continue to "agree to disagree" on whether lead from LBP is considered a CERCLA release. DTSC considers the presence of exterior LBP that has been released to the soil to be CERCLA release. And, while there has been no evaluation of soil-lead hazards at nonresidential buildings, DTSC has determined that the appropriate notifications and restrictions have been included in the FOST to ensure public health and environmental protection.

In regard to perchlorate, DTSC requested that a notification of perchlorate in groundwater be included in the FOST. While a notification will not be in the FOST itself, the DON will provide a fact sheet that includes information on perchlorate detections at the former MCAS El Toro as part of the due diligence material for the upcoming public sale. The fact sheet will also be posted on the public sale website.

**NOTICE OF EXEMPTION**

**To:** Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044, 1400 Tenth Street, Room 212  
Sacramento, CA 95812-3044

**From:** Department of Toxic Substances Control  
Office of Military Facilities  
5796 Corporate Avenue  
Cypress, California 90630

**Project Title:** Corrective Action Complete Determination for FOST Parcels (Parcel IV and Portions of Parcels I, II, and III) and Change of Facility Boundaries at Former Marine Corps Air Station El Toro, CA

**Project Location – Specific:** Former Marine Corps Air Station, El Toro

**Project Location – City:** Irvine

**Project Location – County:** Orange

**Description of Project:**

The Department of Toxic Substances Control (DTSC) is making a determination that corrective action has been completed for approximately 2,798 acres of property at the former Marine Corps Air Station, El Toro (MCAS El Toro) as identified in Final Finding Of Suitability to Transfer (FOST) (Parcel IV and Portions of Parcels I, II, and III) dated July 2004. These parcels were subject to corrective action requirements of the California Hazardous Waste Control Law and the federal Resource Conservation and Recovery Act (RCRA) because they were part of the property of MCAS El Toro, which is an inactive RCRA hazardous waste facility. MCAS El Toro had a RCRA permit that expired in 2003. The RCRA corrective action requirements for the FOST parcels have been completed through investigation and cleanup actions overseen by DTSC, the Regional Water Quality Control Board, Santa Ana Region (RWQCB), and the United States Environmental Protection Agency (U.S. EPA) under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA); and by underground/aboveground storage tank investigation and cleanup actions overseen by the RWQCB and Orange County Health Care Agency. This RCRA corrective action complete determination allows the Department of the Navy to transfer identified parcels to new owners without transferring the associated RCRA corrective action liability. There are no additional physical activities associated with this corrective action complete decision by DTSC for the MCAS El Toro FOST parcels. There are building use restrictions associated with the property transfer due to the presence of lead-based paint and asbestos containing building materials on buildings.

The Navy is retaining approximately 994.7 acres of the facility where closure and corrective action have not been completed. This retained property remains subject to RCRA closure and corrective action requirements. On April 26, 2004, the Department of the Navy submitted to DTSC a map showing the new boundaries of the former MCAS El Toro hazardous waste facility after carving out the FOST parcels. Consistent with its proposed decision that RCRA corrective action has been completed, DTSC is changing the boundaries of the former MCAS El Toro RCRA hazardous waste facility property.

**Background**

Construction of the former MCAS El Toro began in July 1942, and was commissioned in March 1943. El Toro was a USMC pilot's fleet operational training center and air station in support of Fleet Marine Forces, Pacific. Station activities included aircraft operations and maintenance. The 1990 Defense Base Realignment and Closure Commission (BRAC) recommended MCAS El Toro for closure. MCAS El Toro was operationally closed in 1999. MCAS El Toro occupied 4,712 acres until recently. In 1998, 23 acres were transferred to the California Department of Transportation for an expansion of California Interstate 5. In 2001, 896.7 acres of the northeast portion were transferred to the Federal Aviation Administration. Of the remaining 3,792.7 acres, the FOST parcels make up approximately 2,798 acres. Ownership of approximately 994.7 acres not currently suitable for transfer is being retained by the U.S. Navy until environmental response actions including closure and corrective action are completed. 921 acres of the retained property are proposed to be leased under a separate Finding of Suitability to Lease (FOSL). The FOSL established restrictions necessary to allow use of the property without impeding environmental cleanup and to prevent human exposure to hazardous substances during cleanup.

MCAS El Toro was listed on the U.S. EPA National Priorities List and signed a Federal Facility Agreement under CERCLA in 1990. Since then, MCAS El Toro has been performing the CERCLA environmental clean up and restoration of the former base under the guidance and regulatory authority of DTSC, the RWQCB Santa Ana Region, and the U.S. EPA.

Petroleum releases and investigation and cleanup of underground storage tanks and aboveground storage tanks have been performed under the guidance and regulatory authority of the RWQCB and Orange County Health Care Agency.

### The Finding of Suitability to Transfer (FOST) Parcels

The "Final Finding of Suitability to Transfer (Parcel IV and Portions of Parcels I, II, and III), Former MCAS El Toro, California," dated July 2004, summarizes the investigation and cleanup of releases of hazardous substances on the parcels. The FOST was available for public review concurrent with DTSC's proposed Corrective Action Complete Determination from May 3, 2004 to June 17, 2004. The purpose of a FOST for the United States Department of the Navy is to document environmentally related findings that support the conclusion that real property made available through the Base Realignment and Closure (BRAC) process at the former MCAS El Toro, California, is suitable for transfer by deed per provisions of Section 120(h) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). In addition, the FOST identifies disclosure notifications and use restrictions, as specified in the Notifications and Restrictions section, necessary to protect human health or the environment.

The FOST parcels include approximately 2,798 acres of developed and undeveloped land on 4 parcels. Each of the parcels was evaluated for areas where a hazardous substance release is suspected to have occurred; where a documented release has occurred; or, based on the types of activities that occurred in an area, had the potential for a past release. These areas are identified as Locations of Concern or LOCs. The LOCs include sites where waste was handled, known spill or disposal sites, storage tanks, waste-water treatment system sites, PCBs transformers, and other miscellaneous sites. The FOST documents that corrective action has been completed for all LOCs and references associated no further action status decision documents. Please note that the actual number of LOCs is 430, however, some LOCs are located in more than one parcel.

The portion of Parcel I proposed for transfer, also known as Transfer Parcel I-A, consists of approximately 809.5 acres in the northwest portion of the facility. It contains 225 buildings/structures including residential and commercial buildings. Parcel I-A has 218 Locations of Concern (LOCs) which were investigated for contaminant releases.

The portion of Parcel II proposed for transfer, also known as Transfer Parcel II-A, consists of approximately 1,439.6 acres in the central portion of the facility. It contains 1078 buildings/structures and 201 LOCs.

The portion of Parcel III proposed for transfer, also known as Transfer Parcel III-A, consists of approximately 329 acres in the southwest portion of the facility. It contains 10 buildings/structures and 17 LOCs.

Parcel IV is proposed to transfer in its entirety and consists of approximately 219.4 acres at the southernmost extent of the facility. It consists of agricultural lands and contains no structures or LOCs.

The FOST includes a Notifications and Restrictions section which provides warranted notifications and/or restrictions on certain activities to ensure post-transfer use of the FOST parcels is protective of human health and the environment. Notifications are disclosures associated with each parcel such as locations of the Locations of Concern and typical real property disclosures including but not limited to: use and storage of hazardous substances and petroleum products, closed CERCLA cleanup sites, former underground and aboveground storage tanks, wastewater treatment and related systems such as oil-water separators and wash racks, polychlorinated biphenyls containing transformers and storage areas, pesticide use, asbestos containing building materials and lead-based paint. Since many of the buildings are proposed for demolition after transfer, asbestos and lead-based paint abatement has not been completed in all buildings. Specific restrictions limit or prevent certain occupancy or use of these buildings pending either asbestos-containing material and lead paint surveys and abatement or proper demolition. Restrictions discussed in the FOST will be incorporated into the deeds of affected properties within the FOST parcels.

Boundaries between the FOST parcels and retained property were established using: 1) site characterization, 2) buffer zones established in Records of Decisions for Installation Restoration Program Sites, 3) buffer zones established by the California Integrated Waste Management Board for landfills, and 4) conservative estimates of the extent of probable contamination including allowance for adequate staging area used for sites needing further evaluation.

Finally, in accordance with CERCLA, the FOST provides for Right of Access and Covenant. CERCLA requires that for any property transferred from federal ownership to non-federal public or private ownership, the deed will contain a warranty. In effect, the deed for transfer of any property on which a Location of Concern is identified will include a covenant, warranting that all remedial action necessary to protect human health and the environment with respect to any hazardous substances remaining on the property has been taken before the date of such transfer and that any additional remedial action found to be necessary after the date of such transfer shall be conducted by the United States.

Name of Public Agency Approving Project: Department of Toxic Substances ControlName of Person or Agency Carrying Out Project: Department of Toxic Substances Control

## Exempt Status: (check one)

- ☐ Ministerial (Sec. 21080(b)(1); 15268);  
☐ Declared Emergency (Sec. 21080(b)(3); 15269(A));  
☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));  
☐ Categorical Exemption. State type and section number: \_\_\_\_\_  
☐ Statutory Exemptions. State code number: \_\_\_\_\_  
☒ General Rule (Sec. 15061(b)(3))

Exemption Title: With certainty, no possibility of a significant environmental effect.

## Reasons Why Project is Exempt:

1. The project does not involve any physical activities at the former MCAS El Toro. The project is an administrative decision by DTSC that previously completed investigations and cleanup activities conducted under the regulatory oversight of DTSC, the U.S. EPA, the Regional Water Quality Control Board, Santa Ana Region, and the Orange County Health Care Agency, on the property identified in the Finding of Suitability to Transfer (FOST) as Parcel IV and Portions of Parcels I, II, and III, have satisfied the corrective action requirements under RCRA and California Hazardous Waste Control Law. The boundary defining the former MCAS El Toro hazardous waste facility is being modified to exclude the FOST property. No offsite impacts will occur as a result of moving the facility boundaries.
2. The entire former El Toro is listed on the Hazardous Waste and Substances Site List and on the Calsites List. However, for the FOST parcels, all environmental studies and remedial action under CERCLA necessary to protect human health and the environment with respect to hazardous substances remaining on the property have been taken. On this basis, DTSC finds that RCRA corrective action is complete for these parcels.

  
Tayseer Mahmoud, Senior Hazardous Substances Engineer

Lead Agency Contact Person

(714) 484-5419

Phone #

  
DTSC Branch Chief Signature

Date

John Scandura

DTSC Branch Chief Name

Chief, Southern California Branch,  
Office of Military Facilities  
DTSC Branch Chief Title

## TO BE COMPLETED BY OPR ONLY

Date Received For Filing and Posting at OPR: \_\_\_\_\_

**- PUBLIC NOTICE -**  
**MARINE CORPS AIR STATION EL TORO**  
**Finding of Suitability for Transfer (FOST)**  
**and**  
**Proposed RCRA Corrective Action Complete Determination**  
**and**  
**RCRA Facility Boundary Modification**

The Department of the Navy invites the public to review and comment on a Draft Final Finding of Suitability to Transfer (FOST) for certain property at the former Marine Corps Air Station (MCAS) El Toro. The Draft Final FOST concludes that property specifically identified in that document is environmentally suitable for transfer in accordance with Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act.

The California Department of Toxic Substances Control (DTSC) invites the public to review and comment on a proposed Resource Conservation Recovery Act (RCRA) Corrective Action Complete Determination and RCRA hazardous waste facility boundary modification. DTSC finds that all necessary contamination clean up has been completed on the property described in the FOST and proposes to exclude this property from the MCAS El Toro RCRA hazardous waste facility property boundary. A summary of DTSC's proposed Corrective Action Complete Determination and RCRA facility boundary modification has been included in the Draft Final FOST as a section of that document. DTSC has prepared a California Environmental Quality Act Notice of Exemption for the RCRA Determination and facility boundary modification.

MCAS El Toro is a RCRA hazardous waste facility (Facility). Its operating permit expired on August 18, 2003. Corrective action is required at RCRA Facilities to investigate and clean up contamination in the soil and groundwater from past practices. The Draft Final FOST documents that all necessary corrective action has been completed for the property proposed for transfer by deed. DTSC has determined that corrective action requirements continue to apply to the remaining MCAS El Toro property. The maps and detailed descriptions of the property are included in the FOST.

**PUBLIC REVIEW AND COMMENT PERIOD**  
**May 3 through June 17, 2004**

The public is encouraged to comment on the Draft Final FOST and DTSC's proposed Corrective Action Complete Determination and RCRA Facility boundary modification for MCAS El Toro during the 45-day public comment period.

The Draft Final FOST and associated documents and a copy of the proposed RCRA Corrective Action Complete Determination and RCRA Facility boundary modification are available for public review and comment at MCAS El Toro and at the MCAS El Toro Information Repository. To review copies of these documents at MCAS El Toro, please contact Ms. Marge Flesch at (949) 726-5398. The Information Repository is located at:

Heritage Park Regional Library, 14361 Yale Avenue, Irvine, California, (949) 551-7151 (call for current hours).

Access to review public records supporting the Santa Ana Regional Water Quality Control Board or Orange County Health Care Agency cleanup and corrective action decisions for underground storage tanks and above-ground storage tanks relied upon in the Draft Final FOST and proposed RCRA Corrective Action Completion Determination and RCRA Facility boundary modification, including "no further action" decisions, may be reviewed by contacting the Santa Ana Regional Water Quality Control Board at (909) 782-4499 or the Orange County Health Care Agency at (714) 834-3536.

## **Submitting Public Comments**

Written comments submitted on the Draft Final FOST should be postmarked, faxed, or e-mailed by **June 17, 2004**, and sent to:

Mr. F. Andrew Piszkin  
Base Realignment and Closure Environmental Coordinator  
MCAS El Toro  
7400 Trabuco Road, Irvine, CA 92618  
Fax: (949) 726-6586  
e-mail: [Frank.Piszkin@navy.mil](mailto:Frank.Piszkin@navy.mil)

Written comments on the proposed RCRA Corrective Action Complete Determination and RCRA Facility boundary modification should be postmarked, faxed, or e-mailed by **June 17, 2004**, and sent to:

Mr. Tayseer Mahmoud  
DTSC Project Manager  
5796 Corporate Avenue, Cypress, CA 90630  
Fax: (714) 484-54xx  
e-mail: [TMahmoud@dtsc.ca.gov](mailto:TMahmoud@dtsc.ca.gov)

For more information on the Draft Final FOST, please call Mr. Piszkin at (619) 532-0784. For more information on the RCRA Corrective Action Complete Determination and RCRA Facility boundary modification, please call Mr. Mahmoud at (714) 484-5419.

**- PUBLIC NOTICE -**  
**MARINE CORPS AIR STATION EL TORO**  
**Finding of Suitability for Transfer (FOST)**

**and**  
**Proposed RCRA Corrective Action Complete Determination**  
**and**  
**RCRA Facility Boundary Modification**

The Department of the Navy invites the public to review and comment on a Draft Final Finding of Suitability to Transfer (FOST) for certain property at the former Marine Corps Air Station (MCAS) El Toro. The Draft Final FOST concludes that property specifically identified in that document is environmentally suitable for transfer in accordance with Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act.

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**PUBLIC REVIEW AND COMMENT PERIOD**  
**May 3 through June 17, 2004**

The public is encouraged to comment on the Draft Final FOST and DTSC's proposed Corrective Action Complete Determination and RCRA Facility boundary modification for MCAS El Toro during the 45-day public comment period.

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**Submitting Public Comments**

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Mr. F. Andrew Piszkin  
Base Realignment and Closure Environmental Coordinator  
MCAS El Toro  
7400 Trabuco Road, Irvine, CA 92618  
Fax: (949) 726-6586  
e-mail: [Frank.Piszkin@navy.mil](mailto:Frank.Piszkin@navy.mil)

Written comments on the proposed RCRA Corrective Action Complete Determination and RCRA Facility boundary modification should be postmarked, faxed, or e-mailed by **June 17, 2004**, and sent to:

Mr. Tayseer Mahmoud  
DTSC Project Manager  
5796 Corporate Avenue, Cypress, CA 90630  
Fax: (714) 484-5437  
e-mail: [TMahmoud@dtsc.ca.gov](mailto:TMahmoud@dtsc.ca.gov)

For more information on the Draft Final FOST, please call Mr. Piszkin at (619) 532-0784. For more information on the RCRA Corrective Action Complete Determination and RCRA Facility boundary modification, please call Mr. Mahmoud at (714) 484-5419.

LA Times  
May 2, 2004



**- PUBLIC NOTICE -**

**MARINE CORPS AIR STATION EL TORO  
Finding of Suitability for Transfer (FOST)  
and  
Proposed RCRA Corrective Action Complete Determination  
and  
RCRA Facility Boundary Modification**

The Department of the Navy invites the public to review and comment on a Draft Final Finding of Suitability to Transfer (FOST) for certain property at the former Marine Corps Air Station (MCAS) El Toro. The Draft Final FOST concludes that property specifically identified in that document is environmentally suitable for transfer in accordance with Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act.

The California Department of Toxic Substances Control (DTSC) invites the public to review and comment on a proposed Resource Conservation Recovery Act (RCRA) Corrective Action Complete Determination and RCRA hazardous waste facility boundary modification. DTSC finds that all necessary contamination clean up has been completed on the property described in the FOST and proposes to exclude this property from the MCAS El Toro RCRA hazardous waste facility property boundary. A summary of DTSC's proposed Corrective Action Complete Determination and RCRA facility boundary modification has been included in the Draft Final FOST as a section of that document. DTSC has prepared a California Environmental Quality Act Notice of Exemption for the RCRA Determination and facility boundary modification.

MCAS El Toro is a RCRA hazardous waste facility (Facility). Its operating permit expired on August 18, 2003. Corrective action is required at RCRA Facilities to investigate and clean up contamination in the soil and groundwater from past practices. The Draft Final FOST documents that all necessary corrective action has been completed for the property proposed for transfer by deed. DTSC has determined that corrective action requirements continue to apply to the remaining MCAS El Toro property. The maps and detailed descriptions of the property are included in the FOST. This DTSC determination shall have no effect upon the MCAS El Toro National Priorities List site designation.

**PUBLIC REVIEW AND COMMENT PERIOD  
May 3 through June 17, 2004**

The public is encouraged to comment on the Draft Final FOST and DTSC's proposed Corrective Action Complete Determination and RCRA Facility boundary modification for MCAS El Toro during the 45-day public comment period.

The Draft Final FOST and associated documents and a copy of the proposed RCRA Corrective Action Complete Determination and RCRA Facility boundary modification are available for public review and comment at MCAS El Toro and at the MCAS El Toro Information Repository. To review copies of these documents at MCAS El Toro, please contact Ms. Marge Flesch at (949) 726-5398. The Information Repository is located at: Heritage Park Regional Library, 14361 Yale Avenue, Irvine, California, (949) 551-7151 (call for current hours).

Access to review public records supporting the Santa Ana Regional Water Quality Control Board or Orange County Health Care Agency cleanup and corrective action decisions for underground storage tanks and above-ground storage tanks relied upon in the Draft Final FOST and proposed RCRA Corrective Action Complete Determination and RCRA Facility boundary modification, including "no further action" decisions, may be reviewed by contacting the Santa Ana Regional Water Quality Control Board at (909) 782-4499 or the Orange County Health Care Agency at (714) 834-3536.

**Submitting Public Comments**

Written comments submitted on the Draft Final FOST should be postmarked, faxed, or e-mailed by **June 17, 2004**, and sent to:

Mr. F. Andrew Piszkin  
Base Realignment and Closure Environmental Coordinator  
MCAS El Toro  
7400 Trabuco Road, Irvine, CA 92618  
Fax: (949) 726-6586  
e-mail: Frank.Piszkin@navy.mil

Written comments on the proposed RCRA Corrective Action Complete Determination and RCRA Facility boundary modification should be postmarked, faxed, or e-mailed by **June 17, 2004**, and sent to:

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THE ORANGE COUNTY REGISTER

Sunday May 2, 2004